



Stroud District Local Plan Review

Summary of Regulation 20 responses to the Pre-Submission
Draft Plan (Regulation 19 Consultation)

PART 2: Local Plan Policies

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Planning
for our future



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Core Policy DCP1 - Delivering Carbon Neutral by 2030				
Number of representations: 21		Support: 15	Object: 6	Comment: 0
Stakeholders	Comments		Stroud District Council Response	
Support				
North Nibley Parish Council (875)	<ul style="list-style-type: none"> Supports the aim of making the District carbon neutral by 2030, maximising the use of previously developed land and policies for regenerating the canal corridor from Sharpness through to the Stroud valleys. 		Support noted	
Policy wording modifications: None				
Savills for L&Q Estates (913)	<ul style="list-style-type: none"> A significant number of the measures in this policy (notably in respect to the location of development relative to services, facilities and sustainable travel modes) are integral to the spatial strategy as opposed to directly relevant to the determination of the planning applications for individual site proposals. 		This is the first of six 'Core Policies' which sit at the heart of the Plan. They are the principal means of defining and delivering the Draft Plan's proposed development strategy. Whilst more specific requirements are set out in subsequent delivery policies relating to each topic area, the purpose of core policies is to ensure that the priority requirements of all development are clearly established from the start.	
	<ul style="list-style-type: none"> The subsequent references to maximising green infrastructure, the energy hierarchy, reducing waste, and addressing vulnerability and resilience to climate change are all matters which are capable of being considered through the more detailed development management policies. 		This is the first of six 'Core Policies' which sit at the heart of the Plan. They are the principal means of defining and delivering the Draft Plan's proposed development strategy. Whilst more specific requirements are set out in subsequent delivery policies relating to each topic area, the purpose of core policies is to ensure that the priority requirements of all development are clearly established from the start.	
	<ul style="list-style-type: none"> We support much of the approach proposed through Core Policy DCP1; however, we would question the purpose this separate policy is seeking to achieve. 		This is the first of six 'Core Policies' which sit at the heart of the Plan. They are the principal means of defining and delivering the Draft Plan's proposed development strategy. Whilst more specific requirements are set out in subsequent delivery policies relating to each topic area, the purpose of core policies is to ensure that the priority requirements of all development are clearly established from the start.	
Policy wording modifications: None				
Pegasus Group for Robert Hitchins Ltd (879)	<ul style="list-style-type: none"> Strategic policies should in accordance with the NPPF look ahead over a minimum of 15 years from adoption and anticipate and respond to long term requirements. 		The policy is responding to the Government's policy of achieving Net Zero Carbon by 2050 and is therefore relevant for the whole of the Plan period. Nevertheless, the Council considers a target for 2030, is justified by the international importance of minimising climate change as soon as possible.	



Core Policy DCP1 - Delivering Carbon Neutral by 2030		
		There is also emerging evidence that the UK is not delivering progress at the rate required to meet its international obligations and further actions are required at a local level.
	<ul style="list-style-type: none"> Whilst the NPPF and the PPG provide the framework, Pegasus support the policy in so far as the target is for all new development “to be located where the form and mix of development itself or proximity to essential services and facilities minimises the need to travel”... “ to deliver the highest possible share of trips by the most sustainable travel modes”. 	Support noted
	<ul style="list-style-type: none"> The Policies should be consistent with Future Homes Standards. 	Policy DCP1 does not prescribe a specific set of standards, which are set out in subsequent delivery policies. Nevertheless, achieving the highest viable energy efficiency standards must be our collective priority.
Policy wording modifications: None		
RPS Group for Redrow Homes Ltd (948)	<ul style="list-style-type: none"> Support is provided to the Council’s intention to deliver carbon neutral developments by 2030. 	Support noted.
	<ul style="list-style-type: none"> Redrow recognises that the policy follows the requirements that are forthcoming from the UK Government’s target of achieving net-zero carbon by 2050. 	Support noted.
Policy wording modifications: None		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> The commitment adheres to national policy within the 25 year Environment Plan and international commitments under the Paris Accord. 	Support noted.
Policy wording modifications: None		
Black Box Planning for Taylor Wimpey UK Limited (936)	<ul style="list-style-type: none"> Taylor Wimpey support Stroud Local Plan’s ambitious objective to be Carbon Neutral by 2030 as set out in Policy DCP1. 	Support noted.
	<ul style="list-style-type: none"> The Plan is not considered justified or effective in respect of Policy DCP1 in terms of how the policy objective correlates with other policies in the Plan, including the development strategy regarding opportunities to plan sustainably with the carbon 	This representation appears to support Policy DCP1. Responses to objections to other policies and allocations are set out elsewhere in this document.



Core Policy DCP1 - Delivering Carbon Neutral by 2030		
	reduction objective in mind.	
	<ul style="list-style-type: none"> It is not clear how the allocations at Sharpness and Wisloe Green are consistent with this policy objective. 	This representation appears to support Policy DCP1. Responses to objections to other policies and allocations are set out elsewhere in this document.
	<ul style="list-style-type: none"> Taylor Wimpey submit that in the event that the Whaddon site is not found to be required for the needs of Gloucester City or only partly required; the SLP should make provision for the development strategy to allocate land at Whaddon for Stroud District's housing needs. 	This representation appears to support Policy DCP1. Responses to objections to other policies and allocations are set out elsewhere in this document.
	<ul style="list-style-type: none"> Land at Whaddon (site G2) is evidentially a highly sustainable location for development by virtue of its location immediately adjacent to Gloucester City and its associated infrastructure and services and should be allocated for development 	This representation appears to support Policy DCP1. Responses to objections to other policies and allocations are set out elsewhere in this document.
Policy wording modifications: None		
National Trust (304)	<ul style="list-style-type: none"> We support the objective of Stroud District to become Carbon Neutral by 2030 ahead of the Government target of Net Zero Carbon 2050. 	Support noted.
	<ul style="list-style-type: none"> Climate change is the single biggest threat to the precious landscapes, historic houses, and wildlife in our care. The Trust is playing its part by reducing its own emissions, caring for land that captures and stores carbon, and restoring wildlife habitats. 	Support noted.
Policy wording modifications: None		
Object		
Wotton Under Edge Town Council (696)	<ul style="list-style-type: none"> Any new development in Wotton will necessitate private car usage unless much improved public transport facilities are available. 	Policy DCP1 does not prevent the use of the private car but seeks to prioritise other modes where possible.
	<ul style="list-style-type: none"> Discouraging private car usage by making it more difficult for people to use cars (rather than providing good alternatives) is a shortfall in the Plan. A better 	Policy DCP1 does not prevent the use of the private car but seeks to prioritise other modes where possible. The SDLP does support the roll out of EV charging points – see Policy EI12 and the associated vehicular parking



Core Policy DCP1 - Delivering Carbon Neutral by 2030		
	and more practical solution (until the required public transport improvements are in place) would be to encourage EV usage through provision of an effective rural EV charger network across the district accessible to parked vehicles, both on and off street.	standards.
Policy wording modifications: None		
SDC Cllr Haydn Jones (500)	<ul style="list-style-type: none"> The six design codes in policy DCP1 fail to mention the need to protect the most productive agricultural land from development. Failure to properly recognise, acknowledge and accommodate Best and Most Versatile Land is not consistent with national policy. 	Policy DCP1 seeks to maximise green infrastructure to support, amongst other objectives, local food production. Detailed policy referring to agricultural land quality is set out in delivery policy ES3.
Policy wording modifications:		
	<ul style="list-style-type: none"> Amend policy to include reference to protecting Best and Most Versatile Land (Grade 1 - 3A) for local agricultural production in order to help limit food miles and the need for increasing imports of carbon intensive produce. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Comment		
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> CFL support a progressive move towards zero carbon in alignment with impending changes to Building Regulations (Part L and F) and other legislation. 	The policy is responding to the Government’s policy of achieving Net Zero Carbon by 2050. Nevertheless, the Council considers a target for 2030, is justified by the international importance of minimising climate change as soon as possible. There is also emerging evidence that the UK is not delivering progress at the rate required to meet its international obligations and further actions are required at a local level.
	<ul style="list-style-type: none"> Given the HDH work is a key piece of important evidence, the fact it remains a ‘Working Draft’ leaves CFL with little option but to conclude the viability of delivering DCP1 alongside other plan requirements and S106 expectations is not yet justified. Once the working draft is finalised and is not subject to change, CFL may be able to conclude that pursuing a carbon 	The Council’s Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The viability assessment has modelled the expected costs of this policy when assessing overall viability. It is acknowledged that costs and values vary over time. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.



Core Policy DCP1 - Delivering Carbon Neutral by 2030		
	neutral strategy 20 years ahead of national policy is viable when coupled with other development costs.	
	Policy wording modifications:	
	<ul style="list-style-type: none"> The policy should acknowledge the current national planning policy provisions set out within the Climate Change Act 2008, the 2015 Written Ministerial Statement and the NPPG (003 ID:6-003-20140612, 012 ID:6-012-20190315). 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Savills (UK) Limited for The Berkeley Estate (878)	<ul style="list-style-type: none"> The requirement for Stroud District to become carbon neutral is more ambitious than the Government's own aspirations to achieve net-zero greenhouse gas emissions by 2030. 	The policy is responding to the Government's policy of achieving Net Zero Carbon by 2050. Nevertheless, the Council considers a target for 2030, is justified by the international importance of minimising climate change as soon as possible. There is also emerging evidence that the UK is not delivering progress at the rate required to meet its international obligations and further actions are required at a local level.
	<ul style="list-style-type: none"> Building to increased standards will inevitably lead to higher costs and we suggest that SDC carefully consider this approach. The Draft Viability Assessment hints that a limited level of evidence has been prepared to support this commitment. 	The Council's Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The viability assessment has modelled the expected costs of this policy when assessing overall viability. It is acknowledged that costs and values vary over time. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> During the summer 2020 consultation, no details were provided as to how SDC would deliver a carbon neutral district by 2030, just eight and a half years away. 	Paragraph 2.9.5 states that in 2019 the Council resolved to do everything possible to make Stroud District carbon neutral by 2030. The Council's CN2030 Strategy sets out what the Council intends to do, but the District will not become carbon neutral without all parties, including landowners and developers, taking responsibility themselves.
	<ul style="list-style-type: none"> TBE is concerned that the main aim of this policy has the potential to constrain any meaningful level of planned development across the district. This could lead to housing land supply issues in the short and medium terms, therefore allowing more speculative residential development to come forward. 	The SDLP has set out a development strategy, policies and allocations to deliver the level of development required by Government to meet needs.



Core Policy DCP1 - Delivering Carbon Neutral by 2030		
	<ul style="list-style-type: none"> Such requirements will need to be factored into viability appraisals for strategic allocations when establishing what other contributions the development can support. 	Agreed. The Council's Viability Assessment (May 2021) (EB70) has modelled the expected costs of this policy when assessing overall viability.
Policy wording modifications: None		
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> With no fixed Government definition as to what Zero Carbon is, the concern is that the Plan will apply standards that are simply unachievable or add costs to development which is unnecessary. Further clarification is required on this point. 	Policy DCP1 does not apply specific standards, but seeks to reduce energy and waste and the risk of flooding and to maximise green infrastructure, in line with the principles of the NPPF. The Council's Viability Assessment (May 2021) (EB70) has modelled the expected costs of this policy when assessing overall viability.
	<ul style="list-style-type: none"> It remains to be seen how all new developments would be expected to discourage the use of the private car. 	The layout and design of all development can encourage walking and cycling over use of the private car, particularly for short trips.
	<ul style="list-style-type: none"> It is not clear how such an approach would impact on the social and economic wellbeing of future residents of the District. If the Plan wishes to maintain such an approach, further development adjacent to established settlements is critical. 	Supporting the social and economic well-being of the District is set out within the SDLP and reducing energy and waste and the risk of flooding and maximising green infrastructure is not incompatible with this objective.
	<ul style="list-style-type: none"> It is not clear as to how all new developments are expected to support "local food production". There are no prescribed standards in national guidance or in the Local Plan, as to what is expected. There may be instances where the provision of green infrastructure/supporting local food consumption maybe incompatible with the need to sequestration carbon. 	The SDLP includes standards for the provision of green infrastructure including allotments.
Policy wording modifications: None		
Savills (UK) Limited for Coln Residential (934)	<ul style="list-style-type: none"> The requirement for Stroud District to become carbon neutral is more ambitious than the Government's own aspirations to achieve net-zero greenhouse gas emissions by 2030. 	The policy is responding to the Government's policy of achieving Net Zero Carbon by 2050. Nevertheless, the Council considers a target for 2030, is justified by the international importance of minimising climate change as soon as possible. There is also emerging evidence that the UK is not delivering progress at the rate required to meet its international obligations and further actions are required at a local level.



Core Policy DCP1 - Delivering Carbon Neutral by 2030		
	<ul style="list-style-type: none"> Building to increased standards will inevitably lead to higher costs and we suggest that SDC carefully consider this approach 	The Council’s Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The viability assessment has modelled the expected costs of this policy when assessing overall viability. It is acknowledged that costs and values vary over time. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> The Draft Viability Assessment hints that a limited level of evidence has been prepared to support this commitment. During the summer 2020 consultation, no details were provided as to how SDC would deliver a carbon neutral district by 2030 	Paragraph 2.9.5 states that in 2019 the Council resolved to do everything possible to make Stroud District carbon neutral by 2030. The Council’s CN2030 Strategy sets out what the Council intends to do, but the District will not become carbon neutral without all parties, including landowners and developers, taking responsibility themselves.
	<ul style="list-style-type: none"> Concerned that the main aim of this policy has the potential to constrain any meaningful level of planned development across the district. This could lead to housing land supply issues in the short and medium terms, therefore allowing more speculative residential development to come forward. 	The SDLP has set out a development strategy, policies and allocations to deliver the level of development required by Government to meet needs.
Policy wording modifications: None		
Home Builders Federation (HBF) (892)	<ul style="list-style-type: none"> The HBF consider that the Council should comply with the Government’s intention of setting standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council’s specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council should not need to set local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes proposed in the 2021 Part L uplift and the Future Homes Standard 2025 	Policy DCP1 does not apply specific standards, but seeks to reduce energy and waste and the risk of flooding and to maximise green infrastructure, in line with the principles of the NPPF. Other policies, including Policy ES1, set out future standards.
Policy wording modifications: None		



Core Policy DCP1 - Delivering Carbon Neutral by 2030		
Wessex Water (280)	<ul style="list-style-type: none"> Development proposals should only be permitted where adequate surface water disposal systems are available or where suitable arrangements are made for their provision. Development proposals must demonstrate satisfactory disposal of surface water and that Sustainable Drainage Systems have been incorporated. Sustainable Drainage Systems should maximise opportunities for green infrastructure and aim to achieve greenfield run off rates with surface water run-off managed as close as possible to its source. Surface water drainage must not be connected to the foul sewer. 	Policy DCP1 does not deal directly with the specific points made by the representor, which are more appropriately directed, for example, to Core Policy CP14 and Delivery Policy ES4. However, the policy does set out principles relating to the water environment, including to reduce vulnerability to and provide resilience from the impacts arising from a changing climate, for example by locating and designing development to reduce the risk of flooding.
Policy wording modifications: None		
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> SevenHomes consider this Policy to be unsound. Currently, there is no fixed Government definition as to what Zero Carbon is and the concern is that the Plan will apply standards that are simply unachievable or add costs to development which is unnecessary. 	Policy DCP1 does not apply specific standards, but seeks to reduce energy and waste and the risk of flooding and to maximise green infrastructure, in line with the principles of the NPPF. The Council's Viability Assessment (May 2021) (EB70) has modelled the expected costs of this policy when assessing overall viability.
	<ul style="list-style-type: none"> Stroud is a predominantly rural district with a series of urban areas. Whilst development adjacent to the larger urban areas offers considerable benefits for minimising the need to travel by private car, it remains to be seen how all new developments would be expected to discourage the use of the private car. Such terminology represents an active approach in terms of discouraging the use of the private car and how it would be secured via planning. It is not clear how such an approach would impact on the social and economic wellbeing of future residents of the District. If the Plan wishes to maintain such an approach, further development adjacent to established settlements is critical. 	The layout and design of all development can encourage walking and cycling over use of the private car, particularly for short trips. Supporting the social and economic well-being of the District is set out within the SDLP and reducing energy and waste and the risk of flooding and maximising green infrastructure is not incompatible with this objective.



Core Policy DCP1 - Delivering Carbon Neutral by 2030		
	<ul style="list-style-type: none"> SevenHomes support the use and provision of green infrastructure. However, it is not clear as to how all new developments are expected to support “local food production”. There are no prescribed standards in national guidance or in the Local Plan, as to what is expected. Furthermore, there may be instances where the provision of green infrastructure/supporting local food consumption maybe incompatible with carbon sequestration. 	The SDLP includes standards for the provision of green infrastructure including allotments.
Policy wording modifications: None		
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> Terra consider this Policy to be unsound. Carbon – currently, there is no fixed Government definition as to what Zero Carbon is and the concern is that the Plan will apply standards that are simply unachievable or add costs to development which is unnecessary. Further clarification is required on this point. 	Policy DCP1 does not apply specific standards, but seeks to reduce energy and waste and the risk of flooding and to maximise green infrastructure, in line with the principles of the NPPF. The Council’s Viability Assessment (May 2021) (EB70) has modelled the expected costs of this policy when assessing overall viability.
	<ul style="list-style-type: none"> Stroud is a predominantly rural district with a series of urban areas. Whilst development adjacent to the larger urban areas offers considerable benefits for minimising the need to travel by private car, it remains to be seen how all new developments would be expected to discourage the use of the private car. Such terminology represents an active approach in terms of discouraging the use of the private car and how it would be secured via planning. Furthermore, it is not clear how such an approach would impact on the social and economic wellbeing of future residents of the District. If the Plan wishes to maintain such an approach, further development adjacent to established settlements is critical. 	The layout and design of all development can encourage walking and cycling over use of the private car, particularly for short trips. Supporting the social and economic well-being of the District is set out within the SDLP and reducing energy and waste and the risk of flooding and maximising green infrastructure is not incompatible with this objective.



Core Policy DCP1 - Delivering Carbon Neutral by 2030		
	<ul style="list-style-type: none"> Terra support the use and provision of green infrastructure. However, it is not clear as to how all new developments are expected to support “local food production”. There are no prescribed standards in national guidance or in the Local Plan, as to what is expected. Furthermore, there may be instances where the provision of green infrastructure/supporting local food consumption maybe incompatible with the need to sequestration carbon. 	<p>The SDLP includes standards for the provision of green infrastructure including allotments.</p>
Policy wording modifications: None		
<p>Rapleys LLP for Crest Nicholson Land and Partnerships (897)</p>	<ul style="list-style-type: none"> This policy should reflect the relevant provisions within the NPPF – Promoting Sustainable Transport (paragraphs 102-104). As drafted the policy is punitive rather than progressive in its approach and focuses particularly on the marginalisation of private car use when the correct approach is to prioritise and facilitate non-motorised forms of travel – walking and cycling, and public transport over private motorised transport, but to do so through positive planning. 	<p>Policy DCP1 seeks to discourage use of the private car by prioritising walking, cycling and public transport as suggested by the representor. The policy is not punitive as it does not seek to prevent the use of the private car.</p>
Policy wording modifications:		
	<ul style="list-style-type: none"> The policy should acknowledge the current national planning policy provisions set out within the Climate Change Act 2008, the 2015 Written Ministerial Statement and reflected within NPPG (003 ID:6-003-20140612; 012 ID:6-012-20190315), pending replacement. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>



Core Policy DCP1 - Delivering Carbon Neutral by 2030		
RCA Regeneration Ltd for Piper Homes (877)	<ul style="list-style-type: none"> We are broadly supportive of this policy, but if the Council is to become overreliant on brownfield sites, this will become an issue from a viability perspective. Whilst the policy should apply to all development, a flexible approach may be required for these sites and this should be made clear. 	Broad support noted. The SDLP does not have an overreliance on brownfield sites. In any case, this policy does not apply specific standards, but seeks to reduce energy and waste and the risk of flooding and to maximise green infrastructure, in line with the principles of the NPPF. The Council's Viability Assessment (May 2021) (EB70) has modelled the expected costs of this policy when assessing overall viability. More specific standards are set out in other delivery policies.
	<ul style="list-style-type: none"> This policy should refer to overall grid capacity, such as the provision of battery developments and a presumption in favour of developments that would increase grid capacity. 	The policy does support development designed to maximise the delivery of decentralised renewable or low-carbon energy generation.
	Policy wording modifications: None	
RCA Regeneration Ltd for Land Development and Estates Ltd (861)	<ul style="list-style-type: none"> We are broadly supportive of this policy, but if the Council is to become overreliant on brownfield sites, this will become an issue from a viability perspective. Whilst the policy should apply to all development, a flexible approach may be required for these sites and this should be made clear. 	Broad support noted. The SDLP does not have an overreliance on brownfield sites. In any case, this policy does not apply specific standards, but seeks to reduce energy and waste and the risk of flooding and to maximise green infrastructure, in line with the principles of the NPPF. The Council's Viability Assessment (May 2021) (EB70) has modelled the expected costs of this policy when assessing overall viability. More specific standards are set out in other delivery policies.
	<ul style="list-style-type: none"> This policy should refer to overall grid capacity, such as the provision of battery developments and a presumption in favour of developments that would increase grid capacity. 	The policy does support development designed to maximise the delivery of decentralised renewable or low-carbon energy generation.
	Policy wording modifications: None	
Other representations	Issues raised	Stroud District Council Response
The Planning System		
894	<ul style="list-style-type: none"> Planning decisions should take in account up to date 2050 climate change flood predictions. 	Agreed.



Core Policy DCP1 - Delivering Carbon Neutral by 2030		
Requirements		
633	<ul style="list-style-type: none"> All future developments must take into account their impact on greenhouse gas emissions and seek to reduce these as much as possible, both with building design and location within existing town centres. 	Agreed.
423	<ul style="list-style-type: none"> Locally, it should be mandatory for all developments to be carbon neutral as a nation. 	There is a need to facilitate developments to transition to net zero carbon and Policy DCP1 seeks to achieve this ahead of current national policy.
Achievability		
405	<ul style="list-style-type: none"> With the large increase in traffic and HGV s on the roads and the increase in people commuting to work, building plans would prevent this aim from being achieved. 	The SDLP seeks to implement a development strategy which will reduce the need to travel and deliver the highest possible share of trips by the most sustainable travel modes.
423	<ul style="list-style-type: none"> It should be explicit how development is going to be carbon neutral rather stating it as an aim. 	The SDLP has to be read as a whole. This policy establishes the overarching principles and subsequent delivery policies set out the detailed requirements.
Brownfield sites		
86	<ul style="list-style-type: none"> Both commercial and residential building should be focussed in brownfield sites to prevent further erosion of the green belt areas and natural resources of the area. 	The SDLP identifies a priority issue to maximise the potential of brownfield and underused sites to deliver our development needs, but the scale of housing requirements necessitates the development of greenfield land. There is no designated Green Belt within Stroud District.
214	<ul style="list-style-type: none"> The re-use of buildings is better than demolish and new build. 	Policy DCP1 supports the principles of the waste hierarchy, which identifies re-use as better than recycle or new build.
Co-ordinated approach		
86	<ul style="list-style-type: none"> Planning for business and housebuilding needs to be better coordinated. Additional housing needs to be within commercial and business centres. 	One of the principles of the SDLP is to co-locate housing with employment and essential services, wherever possible. This reduces the need to travel as set out in the first bullet point of Policy DCP1.
Policy wording modifications: None		



Core Policy CP2 - Strategic growth and development locations				
Number of representations: 49		Support: 6	Object: 21	Comment: 22
Stakeholders	Comments		Stroud District Council Response	
Support				
North Nibley Parish Council (875)	<ul style="list-style-type: none"> Support the growth strategy for concentration of growth in a few large sites including new settlements at Sharpness and Wisloe subject to adequate physical and community infrastructure being provided in step with development including improved public transport. 		Comment noted.	
Policy wording modifications: None				
Origin3 for Newland Homes and Swan Hill Homes (868)	<ul style="list-style-type: none"> The approach to establishing the minimum number of homes needed in the District is generally supported. 		Comment noted.	
	<ul style="list-style-type: none"> The allocation of specific development sites through the Local Plan process not only provides a greater degree of certainty and confidence in delivery for both the local community and the development industry, but is also in accordance with the NPPF which, sets out that plan making should positively seek opportunities to meet the development needs of their area (paragraph 11 of NPPF). 		Comment noted.	
	<ul style="list-style-type: none"> The identification of a housing requirement for Whitminster is also fully supported: the settlement has a range of local facilities and already benefits from good transport links, to the nearby towns of Stroud and Wotton-under-Edge. 		Comment noted.	
	<ul style="list-style-type: none"> Stroud District Council should be actively promoting additional growth in sustainable locations to satisfy market forces and ensure that sufficient numbers and types of new dwellings are delivered at locations where they are needed. 		Comment noted.	
	<ul style="list-style-type: none"> The Site at Upton Gardens site area the site is suitable for delivering more than 10 dwellings and the requirement of 50 for Whitminster could be marginally increased to reflect this. 		Comment noted.	



Core Policy CP2 - Strategic growth and development locations		
	Policy wording modifications: None	
RPS Group for Redrow Homes Ltd (948)	<ul style="list-style-type: none"> The level of growth as set out in Policy CP2 is supported. It is however noted that the plan will only deliver up to 3,810 affordable homes which is less than half of the unadjusted affordable housing need across the District. Why has a higher level of proposed housing growth, which would deliver increased affordable housing provision to meet local need, not been considered as a viable option for this Local Plan. 	The Topic Paper: Housing needs and supply (EB8) explains that the Local Housing Needs Assessment (LHNA) figure incorporates a significant uplift beyond the household projection-based housing need which together with additional supply within the Plan, to provide flexibility, is sufficient to deliver affordable housing without increasing the housing requirement. The Council will continue to deliver affordable housing through its own New Homes and Regeneration Programme and New Council Homes Strategy with committed funding to further enhance affordable housing provision without the need for a general uplift in the housing requirement.
	<ul style="list-style-type: none"> Support is provided to the allocation of Land to the South of Hardwicke which is appropriate and genuinely available source of new homes, without significant constraints. 	Comment noted.
	<ul style="list-style-type: none"> Support is also given to Stroud’s recognition of their Duty to Co-operate in assisting Gloucester City Council in meeting their un-met housing needs. 	Comment noted.
	<ul style="list-style-type: none"> Policy CP2 refers to housing development taking place within settlement limits; however, the Pre-Submission Draft Plan’s settlement boundary policy maps do not seem to include the Strategic Sites within the areas defined settlement limits. As a matter out soundness and to avoid any doubt or inconsistencies, the boundary of the strategic sites should be included with the defined settlement limits of the Local Plan policy maps. The strategic sites being located outside of defined settlement limits would appear to conflict with Policy CP15 otherwise. 	Policy CP2 makes very clear that development will take place at strategic development sites allocated in the SDLP, within settlement development limits and limited development elsewhere in accordance with other policies of the Plan. The main reason why allocated sites are not shown within SDLs, is because they are yet to be developed and SDLs show the boundaries of existing settlements. If an allocated site were not to come forward in a comprehensively planned manner, inclusion of the site within SDLs could allow for a smaller speculative scheme to be justified in a manner contrary to the aims of SDLs and the Local Plan.
	Policy wording modifications:	
	<ul style="list-style-type: none"> Land included within strategic development sites should be included within the defined settlement boundaries for each corresponding settlement. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Object		



Core Policy CP2 - Strategic growth and development locations		
Minchinhampton Parish Council (504)	<ul style="list-style-type: none"> The allocation of 80 development housing units in Minchinhampton ignores the historic development trend. 	The allocation has been carefully considered within the context of Minchinhampton's role and function and having regard to local housing needs. See, in particular, the Cotswolds AONB Policy Assessment of Draft Allocated Sites (EB39).
	<ul style="list-style-type: none"> It is clear that the site proposed is very capable of being adjusted to deliver significantly more houses than the Plan expects, potentially outside the control of the planning authority to limit such over-development. 	The submitted Local Plan allocates 80 dwellings on PS05 East of Tobacconist Road within the current plan period to reflect evidence on local housing need. Land to the south of PS05, as identified as PS05a on the policies map, will be safeguarded as land with potential to meet the future housing needs of Minchinhampton, if required. The principle of development on PS05a will be considered at the next Local Plan review.
	<ul style="list-style-type: none"> If left in the Plan, the allocation of 80 development housing units in Minchinhampton will be to distort the ability of local infrastructure to absorb pressure. 	All infrastructure impacts are assessed in the IDP including mitigation/improvements. There is no evidence of an inability of the settlement to absorb the development.
	<ul style="list-style-type: none"> The use of open market housing to enable an element of affordability is impractical in this Minchinhampton location, as nothing can be truly affordable with landowner value expectation. 	The delivery of affordable housing as a percentage of the overall development is consistent with the NPPF and the Council's Viability Assessment (May 2021) (EB70) demonstrates that development of greenfield sites of this nature are viable with the policy requirements.
	Policy wording modifications: None	
Wotton under Edge Town Council (696)	<ul style="list-style-type: none"> Given the number of "windfall" sites already provided in Wotton-under-Edge, it is not understood why any further development in Kingswood is needed to satisfy local housing figures. 	The Topic Paper: The Development Strategy explains the strategy for the distribution of housing development across the District and the evidence which supports lesser levels of growth at tier 3a villages, including Kingswood, which have a range of local facilities and which benefit from good transport links, or which have the potential to develop better transport links, to strategic facilities at nearby towns, such as Wotton-under-Edge.
	<ul style="list-style-type: none"> The sustainability of this development location is questionable, being on the far side of Kingswood from Wotton, unless it is assumed that residents will look to centres in South Gloucestershire for their services. 	All sites have been subject to sustainability appraisal, and the proposed allocated site is considered to be the most appropriate site of all reasonable alternative options.
	Policy wording modifications: None	
Eastington Parish Council (332)	<ul style="list-style-type: none"> Paragraph 2.6 table 4 indicates a need for between 62.4ha and 71.8ha employment land up to 2040 but with 11.5 already committed this plan needs to find 	The Plan (CD1) gives significant weight on the need to support economic growth and productivity. It allocates more employment land than recommended in the Gloucestershire Economic Needs Assessment (EB29) to



Core Policy CP2 - Strategic growth and development locations		
	between 50.9 and 60.3ha. Despite this the plan allocates 79ha.	allow for flexibility to accommodate needs not anticipated on the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances. This conforms to the requirements within paragraph 82 of the NPPF (July 2021).
	<ul style="list-style-type: none"> No real account of Covid 19 can have been realised. Indications are that many people will not return to their places of work and as such significantly less volume of workplace is likely to be required. 	Covid 19 is still an ongoing situation and therefore economic data (which has a time lag) and longer term trends have yet to fully emerge. The initial implications of Covid 19 were reviewed by the consultants in the Gloucestershire Economic Needs Assessment (EB29) when establishing future needs.
	<ul style="list-style-type: none"> Eastington is already a net importer of employees and Stonehouse is already one of the districts most important employment hubs so why is the 10ha Eco-park remote from the supportive housing communities rail links being proposed at Junction 13 to draw investment from the 'balanced communities' and which is likely to be favourable to companies who might otherwise have invested on Great Oldbury, Sharpness or within Stroud valleys. 	The NPPF (July 2021) details that planning policies and decisions should " <i>recognise and address the specific locational requirements of different sectors</i> " (paragraph 83). Large industrial/warehousing units at key locations within the A38/M5 corridor was identified as one of the six key segments of market demand in the Gloucestershire Economic Needs Assessment (EB29) for future employment land supply to satisfy. This is a strategic employment site and has been allocated to meet the needs of one of the key employment sectors.
	<ul style="list-style-type: none"> Daily car commuting on the M5 itself from further afield is highly likely to be a main form of transport given its location directly on the motorway Junction. 	Comment noted. The policy for this site includes measures to support the use of public transport and active travel measures to achieve a modal shift from the car. The Council is actively promoting the re-opening of Stonehouse Bristol Road rail station which will provide a real boost to sustainable commuting opportunities.
Policy wording modifications: None		
National Trust (304)	<ul style="list-style-type: none"> We acknowledge the challenge of accommodating this level of new housing within a highly designated district such as Stroud 	Comment noted.
	<ul style="list-style-type: none"> We do not consider an allocation at Minchinhampton (80+ dwellings) is justified or policy compliant. 	The allocation has been carefully considered within the context of Minchinhampton's role and function and having regard to local housing needs. See, in particular, the Cotswolds AONB Policy Assessment of Draft Allocated Sites (EB39).
	<ul style="list-style-type: none"> Whilst the proposed allocation at Painswick does not impact on any nearby National Trust sites, it is within 	The allocation has been carefully considered within the context of Painswick's role and function and having regard to local housing needs. See, in particular,



Core Policy CP2 - Strategic growth and development locations		
	the realm of our Stroud Landscape Project and the concerns we raised regarding the Minchinhampton allocation also apply to the Painswick allocation.	the Cotswolds AONB Policy Assessment of Draft Allocated Sites (EB39).
Policy wording modifications: None		
Falfield Parish Council (884)	<ul style="list-style-type: none"> This Local Plan is not sound and is not positively prepared in terms of the impact on existing communities. Whilst it caters for the need of the major new garden communities and employment areas created, it does not adequately mitigate the detrimental effects on existing residents and existing communities impacted by the proposals. 	The SDLP includes a range of infrastructure and other measures to positively support the development of sustainable communities and to mitigate the impacts of development on the local environment.
	<ul style="list-style-type: none"> Road traffic generated by development at Sharpness, Wisloe Garden village, Cam and Berkeley plus 22 hectares strategic employment growth will rely on the existing A38 to travel to access the M5. 	Transport assessments have identified that development can take place, with appropriate transport infrastructure and mitigation measures, to deliver sustainable communities without a severe impact on the operation of the highway network.
	<ul style="list-style-type: none"> This plan does not consider the environmental amenity and quality of life needs of the existing communities further down the road from the new strategic sites who will bear the brunt of the cumulative output of the additional traffic generated by these new developments, i.e. increased road congestion, increased road noise and poorer air quality. 	The SDLP includes a range of infrastructure and other measures to positively support the development of sustainable communities and to mitigate the impacts of development on the local environment.
	<ul style="list-style-type: none"> Whilst noise attenuation measures and landscape buffers are within the plan for the proposed communities located near the A38 we are not aware of any mitigation measures or improvements for the existing established communities who will be adversely impacted. 	The SDLP includes a range of infrastructure and other measures to positively support the development of sustainable communities and to mitigate the impacts of development on the local environment.
	<ul style="list-style-type: none"> The parish of Falfield is located just south of the Stroud District Council border and we are not aware of or have been asked to be involved in any cross border co-ordination regarding mitigation of the 	The SDLP has raised cross boundary matters and been subject to consultation throughout its preparation and the parish council has been formally consulted on the emerging plan. The District Council has been engaging with South Gloucestershire Council throughout this period to ensure that co-ordination



Core Policy CP2 - Strategic growth and development locations		
	additional impact these significant developments north of our border will definitely have on our parish.	across the boundary is achieved and required mitigations measures are put in place. As detailed proposals emerge, the parish council will be subject to further consultation opportunities.
Policy wording modifications: None		
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> CFL supports the identification of at least 750 dwellings at Hunts Grove and 5ha of employment land at Quedgeley East. However, on the basis that Hunts Grove should be identified as a Local Service Centre (Tier 2 settlement), it would be ineffective to then refer to modest growth taking place in the text on page 55 of the eSDLP. The word modest should be removed from page 55 and the policy will remain operational. 	The Hunts Grove development was allocated in a previous local plan and is currently under construction. The local service centre, which will justify the anticipated future role of Hunts Grove as a Tier 2 settlement, has yet to be completed. Once Hunts Grove is complete, it is anticipated that a modest level of future growth would reflect its role and function. At the current time, however, Hunts Grove does not form part of the settlement hierarchy and therefore there is no inconsistency between the allocation of the site and the settlement hierarchy set out in Policy CP3.
Policy wording modifications:		
	<ul style="list-style-type: none"> The word 'modest' should be removed from page 55. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Grass Roots Planning for Redrow Homes (SW) Ltd (949)	<ul style="list-style-type: none"> There is an extremely high proportion of overall growth on strategic sites. This represents an acute over-reliance on such sites. The number of strategic allocations proposed is significantly higher than nearby authorities. 	The justification for the development strategy is set out within the Topic Paper: The Development Strategy (EB4). The current adopted Local Plan is even more reliant on a small number of strategic sites, yet delivery is progressing on target and the Council can point to a healthy 5 year land supply. The references to neighbouring authorities is not relevant as the development strategy needs to reflect the characteristics of the area concerned.
	<ul style="list-style-type: none"> The plan will fail to meet paragraph 60 of the NPPF (July 2021) which requires 'a sufficient amount and variety of land can come forward where it is needed'. 	The SDLP provides for a broad portfolio of sites including at least 10% of the housing requirement on sites of less than 1 hectare, in accordance with the NPPF, paragraph 69.
	<ul style="list-style-type: none"> Without the removal of some of the strategic sites (such as Sharpness and Wisloe, which we discuss in detail below), and their replacement with a more suitable range of site sizes, we consider that the strategy set out under policy CP2 of the emerging plan is unsound. 	The justification for the development strategy is set out within the Topic Paper: The Development Strategy (EB4). The SDLP includes a broad range of sites.
Policy wording modifications: None		



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Ridge and Partners LLP for Bloor Homes Western (911)	<ul style="list-style-type: none"> 'Land to the south of Walk Mill Lane' is considered a more sustainable site than allocation PS38. 	All sites have been subject to sustainability appraisal, and the proposed allocated site is considered to be the most appropriate site of all reasonable alternative options.
	<ul style="list-style-type: none"> If the Inspector disagrees that allocation PS38 should be omitted, then consideration should be given to Kingswood and its ability to accommodate more development over the plan period 	The Topic Paper: The Development Strategy (EB4) explains the strategy for the distribution of housing development across the District and the evidence which supports lesser levels of growth at tier 3a villages, including Kingswood.
	<ul style="list-style-type: none"> Over the plan period, Kingswood can accommodate more than the 50 dwellings under draft Core Policy CP2. 	The Topic Paper: The Development Strategy (EB4) explains the strategy for the distribution of housing development across the District and the evidence which supports lesser levels of growth at tier 3a villages, including Kingswood.
	<ul style="list-style-type: none"> Understanding the development constraints attached to Wotton-under-Edge, it is reasonable to suggest that further development can be accommodated at Kingswood to offset the absence of growth within Wotton-under-Edge. 	The Topic Paper: The Development Strategy (EB4) explains the strategy for the distribution of housing development across the District and the evidence which supports lesser levels of growth at tier 3a villages, including Kingswood.
	<ul style="list-style-type: none"> Allocation PS38 should be replaced with 'Land to the south of Walk Mill Lane'. 	All sites have been subject to sustainability appraisal, and the proposed allocated site is considered to be the most appropriate site of all reasonable alternative options.
Policy wording modifications: None		
SDC Cllr Haydn Jones (500)	<ul style="list-style-type: none"> Sharpness has been included on the basis of a restored passenger railway service being provided. There is no firm evidence that Network Rail have agreed, that funding is in place or it is a practical proposal. 	Development at Sharpness has been included within the SDLP due to a number of considerations. The development will bring forward a range of sustainable transport measures, including active travel, coach/bus services to key destinations and contributions towards extending local bus services as well as supporting passenger services on the existing branch line. Evidence demonstrating the feasibility of the service has been submitted (see for example, EB95).
	<ul style="list-style-type: none"> It has not been proven or justified that there will be little or no out commuting. Out commuting by private transport will be inevitable. 	The Council's Traffic Forecasting Report (EB61) and updates have modelled the potential traffic flows from and to Sharpness, to ensure that transport infrastructure is provided to support the development.
	<ul style="list-style-type: none"> Employment has been promoted in this location for over thirty years with little uptake. 	There is a growing Science and Technology Park at Berkeley supported by GFirstLEP as well as new logistics development at Sharpness.
	<ul style="list-style-type: none"> There is currently no suitable road link between the A38 and the B4066. This missing link needs to be 	The Council's Traffic Forecasting Report (EB61) and updates have modelled the potential traffic flows from and to Sharpness, to ensure that transport



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	<p>planned and funding secured before any development of the scale proposed at PS36.</p> <ul style="list-style-type: none"> PS37. Wisloe is an unsuitable site for development due to Agricultural Land Classification, noise, pollution, ecology, coalescence, high pressure gas pipeline, sustainable transport, flooding, landscape, archaeology. A detailed summary is available in rep. 	<p>infrastructure is provided to support the development.</p> <p>Wisloe performs relatively well against the other strategic site allocations and other reasonable alternatives when considered against all relevant sustainability criteria.</p>
Policy wording modifications: None		
Lichfields (923)	<ul style="list-style-type: none"> We do not consider Policy CP2 is sound. Without considering in further detail the cumulative impact of development on the highway network and the specific infrastructure to deliver those sites, this policy will not achieve sustainable development. It is therefore not considered to be positively prepared and is not consistent with the NPPF in relation to the test of soundness (paragraph 35). The policy is not supported by sufficient evidence of effective joint working on cross-boundary strategic matters with South Gloucestershire and for this reason we also consider the policy is not justified or effective. 	<p>Comments noted. Ahead of the EIP, the Council is updating its infrastructure and viability evidence base and documentation. This will be published in due course.</p> <p>The Council has been engaged with effective cross-boundary working on strategic matters with South Gloucestershire Council and this work continues. The most recent Statement of Common Ground and a summary of engagement by issue is set out in the Duty to Cooperate Statement (EB3).</p>
Policy wording modifications: None		
Chilmark Consulting for Charterhouse Strategic Land (865)	<ul style="list-style-type: none"> The Local Plan's proposed distribution of growth and development locations set out in Policy CP2 together with Tables 2 and 3 is unsound because it is not: Justified – Policy CP2 does not explain how the proposed level of residential growth for Painswick was established or why, given the role of the settlement as a central focus for the Parish and for the Cotswold Cluster, the level of new housing would meet the needs or address the Plan's vision and objectives for the Painswick or the Cluster as set out in Section 3.8 of the Plan. 	<p>The SDLP proposed distribution of growth is considered to be sound, for the reasons set out below.</p> <p>The role and function of Painswick as set out in Policy CP3 is underpinned by the Council's Settlement Role and Function Study and Update (EB71, EB72). The specific allocation has been carefully considered within the context of Painswick's role and function and having regard to local housing needs. See, in particular, the Cotswolds AONB Policy Assessment of Draft Allocated Sites (EB39).</p>



Core Policy CP2 - Strategic growth and development locations		
	<ul style="list-style-type: none"> Effective – it is not clear how affordable housing needs (stated to be 424 dpa according to the GLHNA and by virtue of Policy CP9) have been reflected into the total planned housing requirement for the District as Policy CP2 sets out and then how that total has been effectively distributed to meet local needs set out in Section 3 and with respect to Policy CP4 (Place Making). 	The Topic Paper: Housing needs and supply (EB8) explains that the Local Housing Needs Assessment (LHNA) figure incorporates a significant uplift beyond the household projection-based housing need which together with additional supply within the Plan, to provide flexibility, is sufficient to deliver affordable housing without increasing the housing requirement. The Council will continue to deliver affordable housing through its own New Homes and Regeneration Programme and New Council Homes Strategy with committed funding to further enhance affordable housing provision without the need for a general uplift in the housing requirement.
	<ul style="list-style-type: none"> Consistent with the NPPF – at paragraph 11a which requires plans to positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change; paragraph 20 that provides that strategic policies should set an overall strategy and make sufficient provision of housing (including affordable housing); and paragraph 35a which requires plans to be positively prepared providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs. 	The SDLP identifies a housing requirement of at least 12,600 new dwellings to meet the needs arising from within Stroud District for the period 2020 to 2040 based on the standard method. A total supply of 14,935 new dwellings is identified in the SDLP i.e. the SDLP exceeds the minimum housing requirement and provides an uplift to satisfy needs and provide flexibility for the market in accordance with the NPPF.
Policy wording modifications: None		
David Lock Associates for Hallam Land Management (915)	<ul style="list-style-type: none"> Core Policy CP2 to be unsound as currently drafted because it does not accurately reflect the situation on the ground at Cam and Dursley. The development Limits proposed by Core Policy CP2 do not reflect the built development, existing and under construction, nor do they reflect the decisions made by the Council – specifically the resolution to grant at land adjacent to Cam and Dursley Railway Station, Box Road and permission granted at Land northwest of Box Road Cam as well as other developments. 	Permitted development at Box Road is in the process of being implemented. Once development has been completed, Cam settlement development limits will be reviewed to reflect the revised built extent of development.
Policy wording modifications: None		
Pegasus Group for Robert Hitchins Ltd	<ul style="list-style-type: none"> Object to the proposed local development sites, it is considered that an additional site should be 	With regard to Land south of Bristol Road, Stonehouse (STO006), the Sustainability Appraisal Table A9.2 (CD3b) states “Having considered the scale



Core Policy CP2 - Strategic growth and development locations		
(879)	allocated, land south of Bristol Road, Stonehouse and the site off School Lane, Whitminster (PS46) can accommodate an increase in the number of dwellings.	of growth appropriate for this settlement set out in the Draft Plan and the benefits and disbenefits of this site in comparison with alternative sites at this settlement, it is not proposed at this stage to allocate this site for development.” With regard to PS46, the development of the site for up to 40 dwellings is considered to be an appropriate number for the site, given its location and the character of the settlement.
	<ul style="list-style-type: none"> If the site at Whaddon is not required, this location should not be included to meet Stroud’s needs, as such an approach would result in approximately 5,100 dwellings in the Gloucester fringe meeting Stroud’s needs, i.e. 64% of the residual housing requirement as currently proposed (i.e. with Hunts Grove and South of Hardwicke). It is considered that Stroud’s needs should be met across the district at the most sustainable locations where it’s needs arise. 	Comment noted. The site at Whaddon is safeguarded in the SDLP to meet the future needs of Gloucester City (i.e. not Stroud District) should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review.
Policy wording modifications: None		
Savills for L&Q Estates (913)	<ul style="list-style-type: none"> The Development Strategy does not accord with national planning policy, or indeed the overriding objectives of the local plan itself. Sharpness is demonstrably undeliverable, and there are concerns in regard to Wisloe that have yet to be addressed. 	The Development Strategy does accord with national policy. The process of producing the SDLP has considered all reasonable alternatives in terms of both strategy and site options. The Topic Paper The Development Strategy (EB4) explains the process and the Sustainability Appraisal (CD3) sets out how the strategy options and all sites have been appraised.
	<ul style="list-style-type: none"> Land at Whaddon represents a more sustainable development site, and indeed, aligns with national and local policy, guidance and aspirations to maximise sustainable travel, and as a result reduce carbon emissions. 	The site is not associated with any established Stroud settlement set out within the settlement hierarchy and offers the potential to contribute to Gloucester City’s housing needs.
Policy wording modifications: None		
Comment		
National Highways (873)	<ul style="list-style-type: none"> The Pre-Submission Draft Local Plan is supported with a Traffic Forecasting Report (March 2021), a Sustainable Transport Strategy (February 2021) and an Infrastructure Delivery Plan (June 2021). 	Comment noted.
	Policy wording modifications: None	



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RPS Group for Stroud Corporation NV (917)	<ul style="list-style-type: none"> RPS welcomes local development sites in Brimscombe & Thrupp will cumulatively deliver 190 units. 	Comment noted.
	<ul style="list-style-type: none"> Ham Mills is an allocated site within the adopted Local Plan. The development of circa 100 dwellings at Ham Mills should be included as part of the allocated growth in the settlement of Brimscombe and Thrupp. The table on page 53 should therefore be updated to circa 290 units for local development sites in Brimscombe & Thrupp. 	Ham Mills is not allocated within the submitted SDLP and therefore should not be identified in the table on page 53. The site was an allocation in the previous adopted SDLP but the site has now received planning permission. As the site is yet to be redeveloped, it is listed as ER3, an existing employment site with scope for regeneration and investment through mixed use re-development, in Delivery Policy Ei2.
Policy wording modifications: None		
Gladman Developments Ltd (905)	<ul style="list-style-type: none"> Gladman acknowledge that Stroud District Council accept that their housing requirement is a minimum figure and are seeking to allocate sites for development which will deliver in excess the figure. 	Comment noted.
	<ul style="list-style-type: none"> The smaller settlements, in particular some of the local service centres and Tier 3a villages have capacity to accommodate significantly more than the 985 dwelling requirement indicated at Table 3. Some of these settlements require additional growth to achieve sustainable patterns of development. 	The Topic Paper The Development Strategy (EB4) explains the strategy for the distribution of housing development across the District.
	<ul style="list-style-type: none"> It is critical that the LPR provides sufficient contingency and flexibility for occasions when housing allocations do not come forwards as planned. From our experience with regards to other Local Plans, Gladman recommend that the LPR should include a 10-20% flexibility factor. This would help ensure the plan is effective and the necessary scale of housing is delivered over the plan period. 	The SDLP identifies a housing requirement of at least 12,600 new dwellings to meet the needs arising from within Stroud District for the period 2020 to 2040 based on the standard method. A total supply of 14,935 new dwellings is identified in the SDLP i.e. the SDLP exceeds the minimum housing requirement and provides an uplift of 18% to satisfy needs and provide flexibility for the market in accordance with the NPPF.
	<ul style="list-style-type: none"> Policy CP2 & CP3 need modification regarding the spatial distribution and important of the key service centres and Tier 3a villages play. Gladman consider that these settlements have capacity to accommodate significantly more than the 985 	The Topic Paper The Development Strategy (EB4) explains the strategy for the distribution of housing development across the District.



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	dwelling requirement indicated at Table 3 - Policy CP2 in total. In order to achieve sustainable patterns of development across the District it is vital that some of these settlements are allocated additional growth.	
Policy wording modifications: None		
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> There is insufficient evidence presented supporting the ability of the local housing market to absorb the magnitude of development which is being proposed. 	The SDLP identifies a range of large and small sites at a number of settlements and new locations for growth which will provide opportunities for the market to deliver this level of housing growth. The overall volume of development reflects the NPPF in providing for at least the minimum requirement with approx. 18% uplift to provide flexibility for the market. The requirement of 630 dwellings per annum was exceeded in 2019/20 when 666 dwellings were delivered.
	<ul style="list-style-type: none"> There is no evidence of a delivery timetable for each site, apart from Table 6 on page 306 of the Plan. If there is any delay in the delivery of these sites this will lead to questions about the overall deliverability of the allocations being provided with the attending concerns on the District not being able to demonstrate a 5-Year Housing Land Supply. 	The Topic Paper: Housing needs and supply (EB8) sets out the expected housing trajectory for the Plan period and the SDLP sets out the breakdown by strategic site. The District can demonstrate a healthy housing supply and there is no evidence to suggest the allocated sites cannot deliver this volume of housing.
	<ul style="list-style-type: none"> It is clear that there are several allocations in the Plan which will take 15 years to deliver (e.g. Sharpness and South of Hardwicke). However, in the case of PS25, the rationale for this being a strategic site is unclear and un-evidenced. It is notable that at 180 dwellings, it is the smallest of the strategic allocations in the plan by at least 120 dwellings and that the two Local Development Sites in Berkley equate to 170 dwellings in any event. The reference to PS25 as a Strategic Development Site should be removed and aligned to a Local Development Site level, or the difference removed from the Plan. 	The SDLP makes clear that allocation site PS25 is an extension to a strategic site within the current adopted Local Plan with a total (combined) size of 630 dwellings, which is clearly of a strategic size. The extension needs to be considered within the context of the wider site and so identifying it as a separate local site would not be appropriate.
Policy wording modifications: None		



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RCA Regeneration Ltd for Piper Homes (877)	<ul style="list-style-type: none"> Policy infers a ceiling or cap through the use of the phrase “cumulative total”, which we consider should be removed to ensure that the plan remains flexible. This is as per paragraph 11(a) of the Framework which states “plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change” (emphasis added). The ‘cap’ inferred here would run contrary to Framework in this regard. 	Policy CP2 uses the phrase “cumulative total” to summarise the total number of houses proposed for allocation in the SDLP. The phrase does not imply that other housing will not come forward at these settlements, for example from windfall sites.
	Policy wording modifications:	
	<ul style="list-style-type: none"> Remove wording “cumulative total” 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Black Box Planning for Taylor Wimpey UK Limited (936)	<ul style="list-style-type: none"> In the unlikely scenario that the JCS should not require Whaddon to be allocated for Gloucester City’s housing requirement, then the site should be re-allocated towards meeting Stroud’s housing needs to ensure development is delivered in the most sustainable manner. 	The site is not associated with any established Stroud settlement set out within the settlement hierarchy and offers the potential to contribute to Gloucester City’s housing needs.
	<ul style="list-style-type: none"> TW question whether the strategic allocations Sharpness and Wisloe Green as identified in CP2 are justified having regard the evidence base and other policy objective in the local plan. The viability evidence for Sharpness is particularly intriguing with numerous assumptions which are questionable including house prices and build cost. 	The Council’s Viability Assessment (May 2021) (EB70) is a robust assessment which has taken into account evidence on house prices and costs and the views of housebuilders. Ahead of the EIP, the Council is updating its infrastructure and viability evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> Land at Whaddon (G2) should be ‘allocated’ for 3,000 dwellings in Policy CP2 rather than safeguarded. 	The SDLP makes clear that the site can only be allocated to meet Gloucester’s needs once the nature of unmet need and the preferred direction of growth for Gloucester has been established through the Joint Core Strategy review process. However, it is expected that this will not delay delivery of the site once the SDLP has been adopted.
	Policy wording modifications: None	



Core Policy CP2 - Strategic growth and development locations		
Black Box Planning for Freeman Homes (938)	<ul style="list-style-type: none"> The District Council have erroneously applied the PPG with the effect that no allocations in the AONB can possibly be made to provide for the needs of Nailsworth. That interpretation is clearly mistaken. Rather, the emphasis of the PPG is that grounds of unmet needs arising from non-designated areas alone, is unlikely to provide sufficient justification for development in the AONB but a case-by-case judgement is required. In the case of land north of Nympsfield Road, the Council had clearly concluded the site was acceptable in landscape terms previously by allocating the site at the Reg 18 Draft Plan stage having taken into account landscape evidence, and the PPG should not alter that judgement. 	Whilst the District Council's Landscape Sensitivity Report (EB36) identified the site as one of the most appropriate locations in terms of landscape impact to accommodate future growth from Nailsworth, if required, national guidance (updated 21072019) has clarified that such a location is unlikely to be a suitable area for meeting the needs arising from adjoining non-designated areas (i.e. Nailsworth). This has been pointed out to us by the AONB Board. As the adjacent football ground is likely to be redeveloped to meet Nailsworth's housing needs and there is evidence of continuing windfall development (including affordable housing) within the town, the Council has resolved that there is insufficient evidence (either in terms of policy principle or housing needs) to justify development in this location at the current time.
	Policy wording modifications:	
	<ul style="list-style-type: none"> Land at Nympsfield Road (PS07) should be reinstated as an allocation for Nailsworth within policy CP2. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Ridge and Partners LLP (898)	<ul style="list-style-type: none"> The draft LP could be more consistent with national planning policy and support both the Council's and the Government's ambition to achieving a carbon neutral future by including the Moreton Valence Growth Point, as a more sustainable development option. 	The Additional Housing Options Consultation Report (CD4e) explained that the site performs less well than alternatives sites in terms of meeting sustainability appraisal objectives and compatibility with the proposed development strategy.
	Policy wording modifications: None	
Kingswood Parish Council (956)	<ul style="list-style-type: none"> It is unclear as to why a Plan period of 20 years has been chosen. The start date of 2020 does not allow adequate lead in time to ensure that adequate engagement and due diligence has taken place. 	Local plans should include strategic policies covering a minimum of 15 years from adoption. Consequently, allowing for preparation and adoption during the first few years, most local plans have a 20 year timeframe.
	Policy wording modifications: None	



Core Policy CP2 - Strategic growth and development locations		
Grass Roots Planning for Clifton Homes (SW) Ltd (887)	<ul style="list-style-type: none"> Sharpness and Wisloe are undeliverable and unsustainable and should be removed and replaced with a more suitable range of site sizes. Unless this is changed we consider that the strategy set out under policy CP2 of the emerging plan is unsound. 	The SDLP already includes a broad range of site sizes and locations to meet the needs of the market. The site allocations at Sharpness and Wisloe are considered to be sustainable and deliverable.
Policy wording modifications: None		
Joint Core Strategy Authorities (916)	<ul style="list-style-type: none"> To improve the effectiveness of the plan, it is suggested that the safeguarded Land at Whaddon is also included in Policy CP2 and references to possible memorandums of understanding included. 	Policy CP2 does include the site at Whaddon as well as references to the need to be consistent with the approved strategy for the Joint Core Strategy review. The Council has sought to agree Statements of Common Ground with the Joint Core Strategy authorities. These draft SOCG are set out in the Council's Duty to Cooperate Statement (EB3) and discussions continue.
Policy wording modifications: None		
Grass Roots Planning for Redrow Homes (SW) Ltd (951)	<ul style="list-style-type: none"> SDC are relying far too heavily on strategic sites to come forward in a timely fashion to deliver the housing required, as well as ensuring that there is a robust 5YHLS. 	The justification for the development strategy is set out within the Topic Paper: The Development Strategy (EB4). The SDLP does include a broad mix of site sizes and locations to meet the needs of the market. The current adopted Local Plan is even more reliant on a small number of strategic sites, yet delivery is progressing on target and the Council can point to a healthy 5 year land supply.
	<ul style="list-style-type: none"> A broader portfolio of sites is required to achieve a balanced range of site sizes and types, which will allow development to come forward early on in the plan period, including the provision of affordable housing. 	The SDLP already identifies a broad range of large, medium and small sites at a number of settlements and new locations for growth which will provide opportunities for the market to deliver this level of housing growth, including the delivery of affordable housing.
	<ul style="list-style-type: none"> Sharpness and Wisloe are not sustainable or deliverable and should be replaced with more appropriate smaller sites. 	The SDLP already includes a broad range of site sizes and locations to meet the needs of the market. The site allocations at Sharpness and Wisloe are considered to be sustainable and deliverable.
	Policy wording modifications: None	
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> 12,800 new dwellings in the District is unsound in that the target does not reflect national guidance regarding the minimum housing figure proposed in the Standard Method 	The SDLP identifies a housing requirement of at least 12,600 new dwellings to meet the needs arising from within Stroud District for the period 2020 to 2040 based on the standard method. A total supply of 14,935 new dwellings is identified in the SDLP i.e. the SDLP exceeds the minimum housing requirement and provides an uplift to satisfy needs and provide flexibility for the market in accordance with the NPPF.



Core Policy CP2 - Strategic growth and development locations		
	<ul style="list-style-type: none"> There is no evidence of a delivery timetable for each site, apart from Table 6 on page 306 of the Plan. If there is any delay in the delivery of these sites, this will lead to questions about the overall deliverability of the allocations being provided with the attending concerns on the District not being able to demonstrate a 5-Year Housing Land Supply. 	The Topic Paper: Housing needs and supply (EB8) sets out the expected housing trajectory for the Plan period and the SDLP sets out the breakdown by strategic site. The District can demonstrate a healthy housing supply and there is no evidence to suggest the allocated sites cannot deliver this volume of housing.
	<ul style="list-style-type: none"> There is not enough evidence to suggest the following sites have market demand as they are all too close together: <ul style="list-style-type: none"> Cam North-West – 700 dwellings. Sharpness Docks – 300 dwellings. Sharpness – 2,400 dwellings. Wisloe – 1,500 dwellings 	All of these sites are being actively promoted for development. Development has recently been under construction in both Cam and Berkeley. There is no evidence of a lack of market demand in these areas.
	<ul style="list-style-type: none"> SevenHomes' interests at Frampton on Severn should be allocated as it can provide a minimum of 60 dwellings and can deliver within a 5-year timeframe and reduce the Council's dependency on larger strategic sites. 	The site at Whitminster Lane, Frampton is allocated for development (PS44). The site area is smaller than the representor wishes to retain appropriate separation between Frampton and Oatfield, protect the rural setting of the adjacent Industrial Heritage Conservation Area and minimise the loss of agricultural land.
	<ul style="list-style-type: none"> The separation between strategic and local development sites is unhelpful and the evidence base does not show why this decision has been reached and why it is necessary. 	There is a clear distinction between the scale of growth proposed at strategic sites and local development sites. Whilst the North East Cam extension is for 180 dwellings, it completes a strategic site of 630 dwellings.
Policy wording modifications: None		



Core Policy CP2 - Strategic growth and development locations		
Blue Fox Planning Ltd for Persimmon Homes Severn Valley (928)	<ul style="list-style-type: none"> There should be greater emphasis to ensure that there is a sufficiently flexible policy framework which maximises development from identified allocations. This could be achieved through increased densities (where appropriate) and by ensuring that the proposed housing identified for each allocation is not applied as a cap that would otherwise arbitrarily frustrate the achievement of increased scales of development. This is particular relevance where this can be achieved in a manner that is consistent with the wider objectives of the Local Plan and the basis of these allocations as articulated within the respective 'mini visions' and guiding principles, such as land controlled by PHSV at PS24 and PS38. 	The SDLP includes flexibility with many strategic allocations, using terms, for example, such as "approximately" in the case of PS24. There is less room for flexibility at some smaller sites (e.g. PS38), or where there are identified constraints. Densities reflect the character of settlements.
Policy wording modifications: None		
Home Builders Federation (HBF) (892)	<ul style="list-style-type: none"> The latest National Planning Practice Guidance (NPPG) sets out that authorities should have a SoCG available on their website by the time of publication of their Draft Plan, in order to provide communities and other stakeholders with a transparent picture of collaboration. Once published, the Council will need to ensure that any SoCG continues to reflect the most up-to-date position of joint working (ID 61-020-20190315). The Stroud LPR pre-submission consultation is accompanied by an unsigned Draft SoCG between the Gloucestershire authorities. However, this is only a statement of intention. The Council should agree a SoCG with the GCT JCS authorities, which sets out an agreed position on housing needs and the meeting of any unmet needs arising from Gloucester up to 2040. 	The Council published on the Council's website the SOCGs which existed at the time the Draft SDLP was published. Subsequently, the Duty to Cooperate Statement (EB3) submitted with the Plan sets out other SOCG and draft SOCG which have been agreed to date. The Council has approved the Gloucestershire SOCG and neighbouring authorities are going through the approval process. The Council has sought agreement with the JCS authorities for two SOCG but the JCS authorities have yet to agree to the documents.
	<ul style="list-style-type: none"> The NPPG indicates that if previous housing delivery 	The housing delivery achieved in 2019/20 of 666 dwellings is not "significantly



Core Policy CP2 - Strategic growth and development locations		
	<p>has exceeded the minimum LHN, the Council should consider whether this level of delivery is indicative of greater housing need (ID 2a-010-20201216). It is noted that the 2020 Housing Delivery Test (HDT) Results identify housing completions of 666 dwellings in 2019/20, which significantly exceeds the adopted Local Plan housing requirement of 456 dwellings per annum and marginally exceeds the minimum LHN of 630 dwellings per annum. The Council should consider if there are “circumstances” to justify a housing requirement above the minimum LHN.</p>	<p>greater” than the level of housing required from the standard housing method for Stroud District of 630 dwellings. Nor is it representative of housing delivery across a number of years and in fact is the only year that the minimum requirement of 630 dwellings has been achieved. It does, however, show that the District Council has provided for an uplift in housing provision since the 2010s, through the adoption of a Local Plan in 2015 and the timely progress of the new SDLP.</p>
	<ul style="list-style-type: none"> The plan should include a clearer statement of which are strategic and non-strategic policies. 	<p>The SDLP includes extensive references to strategic policies and strategic sites where appropriate.</p>
<p>Policy wording modifications: None</p>		
CPRE Gloucestershire (847)	<ul style="list-style-type: none"> There is nominal overprovision of 2,335 dwellings or 29%. Even making due allowance for the “minimum” in relation to requirements, the use of the phrase “at least” in the first sentence of Policy CP2 and the need for some flexibility, CPRE considers this surplus to be excessive and not justified. On this basis Berkeley Vale site is too large. 	<p>The SDLP identifies a housing requirement of at least 12,600 new dwellings to meet the needs arising from within Stroud District for the period 2020 to 2040 based on the standard method. A total supply of 14,935 new dwellings is identified in the SDLP i.e. the SDLP exceeds the minimum housing requirement and provides an uplift of 18% to satisfy needs and provide flexibility for the market in accordance with the NPPF.</p>
	<ul style="list-style-type: none"> If the rate at which local jobs are created does not keep pace, the result will be even greater levels of out-commuting, mostly likely by car and therefore inconsistent with the principle of sustainable development 	<p>The SDLP provides for an employment range at the higher end of forecasts for identified local needs and a broad range of sites and locations to provide flexibility and positive support for the local economy in line with the NPPF.</p>
	<ul style="list-style-type: none"> Figure E in Table 3 refers to the subtraction of sites considered “undeliverable”. This amounts to 620 dwellings (a figure which has to be calculated rather than appearing in the table itself) and there is nothing about the identity of these sites or even general reasons why they are considered undeliverable. 	<p>The Topic Paper Housing Needs and Supply (EB8) provides further information on the breakdown of housing needs and supply. The undeliverable commitments as at 1 April 2020 of 620 houses is set out in Table 2. This relates to large permissions where evidence exists that they will not come forward and a discounted figure relating to small site permissions. More information is contained within the Five Year Housing Land Supply Report 2020 (EB14)</p>



Core Policy CP2 - Strategic growth and development locations		
	Policy wording modifications: None	
Stagecoach West (952)	<ul style="list-style-type: none"> The housing need should as far as possible be met closest to where such need arises. While we support both draft allocations G1 and G2, on the grounds of their inherent sustainability, we therefore have significant concerns that the current approach to meeting identified unmet need from Gloucester is sufficiently justified or appropriate. 	<p>The explanation of the Council’s approach to meeting unmet needs from Gloucester City is set out within the Duty to Cooperate Statement (EB3) chapter 5. The JCS authorities have supported this approach in their Reg.19 response and will be undertaking an urban capacity study to establish Gloucester’s potential housing shortfall as part of the development of their preferred strategy. Site G1 is associated with an established Stroud settlement and is allocated to contribute to Stroud’s needs, whilst site G1 which is not functionally related to any significant Stroud settlement is safeguarded to meet Gloucester’s needs subject to unmet needs being established.</p>
	Policy wording modifications: None	
	<ul style="list-style-type: none"> Policy CP2 should be altered such that: “Stroud District will make a contribution to meeting the immediately identifiable unmet housing needs of Gloucester City for within the first 10 year of the Plan period by providing for growth at the following location: G1 Land South of Hardwicke: 1350 dwellings Subject to it being required to meet needs and provided locating growth at this location is consistent with the approved strategy for the Joint Core Strategy Review, Stroud District will make a contribution to meeting the unmet housing needs of Gloucester City over the longer term at the following location: G2 Land at Whaddon: at least 3000 dwellings we accept that this then requires additional sites to be identified consistent with the spatial strategy of the Plan. We consider that site WHI014 Land at Grove End Farm Whitminster represents a clear opportunity to rebalance the spatial strategy appropriately, providing for the District’s housing needs closest to 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>



Core Policy CP2 - Strategic growth and development locations		
	the largest concentration of population, activity and employment at Stonehouse and Stroud.	
Leonard Stanley Parish Council (824)	<ul style="list-style-type: none"> The statements made under 2.3.8, 2.3.9 and 2.5.8 are completely misleading, as for example, Brimscombe & Thrupp has an allocation of 190 whilst Painswick just 20! 	The Development Strategy has to be read as a whole. Whilst the settlement hierarchy is an important element of the Development Strategy, there are other elements of the Strategy. For example, the allocation of the Brimscombe Port site at Brimscombe is an existing adopted Local Plan allocation carried forward which will contribute to the strategy for the regeneration of the canal corridor thorough the Stroud valleys (para. 2.3.6).
Policy wording modifications: None		
BBA Architects for Vistry Group (912)	<ul style="list-style-type: none"> The percentage of dwellings to Local Development Sites within/adjacent to accessible, sustainable settlements should be increased. This could be achieved by reducing the numbers of dwellings allocated to the new settlements in the plan period, taking into account realistic delivery rates, or removing one or two strategic sites which are in direct competition with other strategic sites. 	The justification for the development strategy is set out within the Topic Paper: The Development Strategy (EB4). The SDLP does include a broad mix of site sizes and locations to meet the needs of the market. When considering the overall percentage growth at certain locations, the representor also needs to take into account existing commitments, as well as allocations.
	<ul style="list-style-type: none"> Further housing allocations should be directed to the Wotton Cluster as a sustainable location for growth and balancing with the significant employment allocation proposed. With Wotton-under-Edge physically constrained, Kingswood, which is closely related to, and shares much of its facilities with Wotton-under-Edge would be an appropriate location for further housing allocations. 	The justification for the development strategy is set out within the Topic Paper: The Development Strategy (EB4). It explains the strategy for the distribution of housing development across the District and the evidence which supports lesser levels of growth at tier 3a villages, including Kingswood, which have a range of local facilities and which benefit from good transport links, or which have the potential to develop better transport links, to strategic facilities at nearby towns, such as Wotton-under-Edge.
	<ul style="list-style-type: none"> If the Inspector is minded to maintain the existing proportion of Strategic Allocations, Reserve Sites should be included to provide flexibility and a contingency to ensure the housing requirement is met and the plan remains effective. Kingswood would be an appropriate location to identify additional reserve sites. 	A total supply of 14,935 new dwellings is identified in the SDLP i.e. the SDLP exceeds the minimum housing requirement and provides an uplift of 18% to satisfy needs and provide flexibility for the market in accordance with the NPPF. There is no need for reserve sites.
Policy wording modifications: None		



Core Policy CP2 - Strategic growth and development locations		
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> Concerned that the provision of at least 12,800 new dwellings in the District is unsound in that the target does not reflect national guidance regarding the minimum housing figure proposed in the Standard Method 	The SDLP identifies a housing requirement of at least 12,600 new dwellings to meet the needs arising from within Stroud District for the period 2020 to 2040 based on the standard method. A total supply of 14,935 new dwellings is identified in the SDLP i.e. the SDLP exceeds the minimum housing requirement and provides an uplift to satisfy needs and provide flexibility for the market in accordance with the NPPF.
	<ul style="list-style-type: none"> Increase the flexibility on the other allocations being put forward in the Plan, with reference to Avant's interests at Dursley, the site could deliver circa 60 dwellings, providing a site that can deliver within a 5-year timeframe and reduce the Council's dependency on larger strategic sites. 	A total supply of 14,935 new dwellings is identified in the SDLP i.e. the SDLP exceeds the minimum housing requirement and provides an uplift of 18% to satisfy needs and provide flexibility for the market in accordance with the NPPF. There is no need for additional sites.
	Policy wording modifications: None	
Other representations	Issues raised	Stroud District Council Response
Housing Numbers		
86	<ul style="list-style-type: none"> The specific growth target of 20 additional houses over the period seems both achievable and acceptable 	Comment noted.
Development Strategy		
489	<ul style="list-style-type: none"> Most people accept that some level of growth is acceptable - but the scale and nature of development needs to relate to the existing settlement. This is particularly pertinent to Newtown/Sharpness and Wisloe 	The justification for the development strategy is set out within the Topic Paper: The Development Strategy (EB4). This makes the point that the level of growth required cannot not be met simply through urban extensions to the main settlements and smaller scale development at the smaller settlements. A hybrid strategy incorporating growth points is required.
489	<ul style="list-style-type: none"> The growth points allocated in CP2 at Sharpness and Wisloe will not provide the most sustainable developments. 	The justification for the development strategy is set out within the Topic Paper: The Development Strategy (EB4). A hybrid strategy incorporating growth points is required. The Sharpness and Wisloe sites meet the Development Strategy objectives and perform well compared against other alternative sites.
489	<ul style="list-style-type: none"> All settlements identified in Core Policy CP3 as having settlement boundaries are suitable for some level of growth. Wisloe is not identified as having settlement 	The new settlements at Wisloe is not included within the settlement hierarchy at present and the scale and nature of their growth and development will be determined through its site allocation policies and subsequent planning



Core Policy CP2 - Strategic growth and development locations		
	boundaries and would not qualify for any growth	applications. However, once development is sufficiently advanced to establish its anticipated role and function, it is expected that (through a future Local Plan Review) it will be defined as settlement in its own right, with a settlement development limit.
633	<ul style="list-style-type: none"> CP2 does not reflect consultation results which preferred small dispersed additional housing in villages rather than large development on greenfield sites. 	The justification for the development strategy is set out within the Topic Paper: The Development Strategy (EB4). Initial consultation in 2017 indicated concentrated growth options were more popular than dispersed growth options. Only later in the process, when specific large sites had been proposed, did consultation results favour a more dispersed approach.
603	<ul style="list-style-type: none"> Brimscombe and Thrupp contributes 190 allocated dwellings towards the 985 allocated dwellings on “local sites at smaller settlements”, approximately 19%. - the highest allocation number of all of the smaller settlements, but is also greater than some higher tier settlements. 	The Development Strategy has to be read as a whole. Whilst the settlement hierarchy is an important element of the Development Strategy, there are other elements of the Strategy. For example, the allocation of the Brimscombe Port site at Brimscombe is an existing adopted Local Plan allocation carried forward which will contribute to the strategy for the regeneration of the canal corridor thorough the Stroud valleys (para. 2.3.6). A calculation of the overall distribution of growth also needs to include existing commitments, which are proportionally greater at existing towns and strategic allocations.
603	<ul style="list-style-type: none"> Brimscombe Mill and Port are allocations in the current Local Plan and neither have planning permission, suggesting they are not readily deliverable. 	Evidence from the agent/developer of Brimscombe Mill, collected for the Five Year Land Supply Report November 2021, suggests that the site is deliverable. £1.6million of capital funding has been agreed towards the cost of infrastructure to support redevelopment of the site. Planning permission has been received for the necessary infrastructure to take the site out of the flood plain and for demolition works across the site together with listed building consent for the demolition of curtilage listed buildings associated with the listed mill building and the Port House. Demolition has now commenced. A procurement process has started to appoint a developer partner.
894	<ul style="list-style-type: none"> Nominal over provision of 2,335 dwellings is excessive and not justified. 	A total supply of 14,935 new dwellings is identified in the SDLP i.e. the SDLP exceeds the minimum housing requirement and provides an uplift of 18% to satisfy needs and provide flexibility for the market in accordance with the NPPF.



Core Policy CP2 - Strategic growth and development locations		
Carbon Neutral / Climate Change		
423, 894	<ul style="list-style-type: none"> The housing may be carbon neutral, but living in the development zones and commuting to work will definitely not be. 	The strategy is to concentrate most development at a series of strategic locations, where housing, jobs and necessary infrastructure can be coordinated and delivered in a timely manner to reduce the need to travel.
894	<ul style="list-style-type: none"> The Council should reconsider the size of the strategic allocations in the Berkeley Vale part of the District especially in view of the recent climate change floods in Europe which show that the true cost of poor planning and out of date flood defences is paid in lives. 	The part of the Sharpness allocation identified for housing development is located outside of the functional floodplain and within flood zone 1.
Employment space		
214	<ul style="list-style-type: none"> Given the loss of employment space in the Stroud Valleys, there is just 15 hectares of "new provision" in the Stroud "urban area". 	The Employment Land Review (EB30) highlights existing trends where a lot of the older B use properties which no longer meet business needs have converted to retail/trade uses as E/B Class business. However, the SDLP safeguards existing key employment areas and identifies more modern accommodation in other parts of the District to reflect key market areas.
Policy wording modifications: None		



Core Policy CP3 - Settlement Hierarchy				
Number of representations: 38		Support: 5	Object: 12	Comment: 21
Stakeholders	Comments		Stroud District Council Response	
Support				
Origin 3 for Newland Homes and Swan Hill Homes (868)	<ul style="list-style-type: none"> The identification of Whitminster as a Tier 3a settlement is wholly supported. Whitminster is one of the District's larger villages and performs an important local employment, service and community role. 		Comment noted.	
	<ul style="list-style-type: none"> The development strategy for Tier 3a settlements which allows for (inter-alia) organic growth on the edge of these settlements to meet local housing, employment and community infrastructure needs, is wholly supported. Tier 3a settlements such as Whitminster can accommodate a level of growth needed to support the vitality of these communities and can provide for flexibility and diversity in the housing supply through the range and type of sites they can bring forward. 		Comment noted.	
	<ul style="list-style-type: none"> Reference NPPF para.s 59 and 78, citing the Government's objective of significantly boosting the supply of homes and the importance of ensuring a sufficient amount and variety of land that can come forward where it is needed; and the need to locate new housing where it can enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. This approach is true for Whitminster and the approach taken in the Draft Plan is supported. 		Comment noted.	
Policy wording modifications: None				



Core Policy CP3 - Settlement Hierarchy		
Gladman Developments Ltd (905)	<ul style="list-style-type: none"> Settlement hierarchy as a means of distributing/apportioning housing growth and delivering a growth strategy: <ul style="list-style-type: none"> Gladman are supportive of a strategy which adopts a hybrid approach to growth, in so much as it directs growth to a range of tiers of settlements and also to the creation of new settlements. In allocating sites, the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required: a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery. Supportive of new settlements as part of an overall growth strategy, they can play an important role in housing delivery across the plan period; but the Plan must be realistic about their delivery: Gladman recommends the withdrawal of the Local Plan on the basis that there is a lack of evidence to justify deliverability. 	<p>The Council considers ‘new settlement’ Strategic site allocations PS36, PS36 and PS30 to be in accordance with the development strategy. The process of producing the SDLP has considered all reasonable alternatives in terms of both strategy and site options. The Sustainability Appraisal (CD3) sets out how the strategy options and all sites have been appraised. Topic Paper: The Development Strategy October 2021 (EB4) sets out the Council’s approach to identifying and assessing potential spatial strategy options and how the development strategy was selected to meet requirements. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>The Topic Paper: Housing needs and supply (EB8) sets out the expected housing trajectory for the Plan period and the SDLP sets out the breakdown by strategic site. The District can demonstrate a healthy housing supply and there is no evidence to suggest the allocated sites cannot deliver this volume of housing.</p> <p>Site-specific concerns about the delivery and viability of large ‘new settlement’ allocations have been addressed individually through the summary of Regulation 20 responses for proposed site allocations PS36 and PS37. Recent rates of building at Hunts Grove and Great Oldbury demonstrate that this level of development is achievable within Stroud District.</p>
	<ul style="list-style-type: none"> Key service centres and Tier 3a villages have capacity to accommodate significantly more housing growth than is apportioned through CP2. The Plan should allocate additional growth to some of these settlements. 	<p>The Topic Paper: The Development Strategy (EB4) explains the strategy for the distribution of housing development across the District and the evidence which supports lesser levels of growth at tier 3a villages.</p>
	<ul style="list-style-type: none"> Kingswood (Tier 3a) is a net importer of employees; additional housing growth here would assist in reducing the need to travel and would support broad sustainability objectives. 	<p>The Topic Paper: The Development Strategy (EB4) explains the strategy for the distribution of housing development across the District and the evidence which supports lesser levels of growth at tier 3a villages, including Kingswood.</p>
	<p>Policy wording modifications: None</p>	



Core Policy CP3 - Settlement Hierarchy		
Blue Fox Planning Ltd for Persimmon Homes Severn Valley (928)	<ul style="list-style-type: none"> The classification of settlements provides a useful policy basis upon which the role and function of individual settlements/locations can be determined, relative to each other. 	Comment noted.
	<ul style="list-style-type: none"> Settlement hierarchy as a means of distributing/apportioning housing growth: <ul style="list-style-type: none"> Support the emphasis of the delivery strategy that seeks to direct growth to those locations served by services and facilities; Support the approach that the primary, strategic levels of growth and development should occur in the Tier 1 main settlements (including land controlled by PHSV to the West of Draycott, Cam); However, use of the settlement hierarchy to determine the precise scale of development at each settlement, relative to their position within the hierarchy (particularly those within Tier 3) risks constraining wider sustainable development opportunities, where such opportunities are required to maximise housing delivery over the plan period; There should greater recognition within the Local Plan that the ability of individual settlements to accommodate growth in a sustainable manner is informed by site specific circumstances and those prevailing at individual settlements. The focus on the Settlement Hierarchy as determinative in the distribution and scale of development at individual settlements fails to acknowledge this. 	<p>The Council considers draft policy CP3 will help to deliver sustainable development. Supporting text for Core Policy CP3 explains that the development strategy seeks to prioritise growth at sustainable locations, concentrating housing growth in those settlements that already have a range of services and facilities (as long as there is capacity for growth), and restricting it in those that do not (2.9.15).</p> <p>The Topic Paper: The Development Strategy (EB4) explains the strategy for the distribution of housing development across the District and the evidence which supports lesser levels of growth at Tier 3a settlements and more limited development at Tier 3b settlements.</p> <p>Supporting text paragraph 2.9.16 explains that the settlements set out within the CP3 hierarchy all have defined settlement development limits, within and (exceptionally) adjacent to which suitable development may be permitted. The nature and extent of “suitable” development is defined through various Core and Delivery polices, allowing for holistic consideration of settlement-specific needs, opportunities and constraints.</p>
Policy wording modifications: None		



Core Policy CP3 - Settlement Hierarchy		
Object		
Minchinhampton Parish Council (504)	<ul style="list-style-type: none"> • Minchinhampton is incorrectly identified as a Tier 2 settlement. • Against the definition of settlements set out by CP2, reality points clearly to a Tier 3 designation. • Sustainable growth is more problematic in a Tier 3 settlement, which is where we believe we sit. 	Justification for the role of Minchinhampton in the development strategy (including its designation as a Tier 2 settlement) and the allocation of site PS05 to meet identified local needs is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).
	<ul style="list-style-type: none"> • Retail and connectivity are limited and have declined since the hierarchy was originally assessed in 2012 and re-evaluated in 2019. • The PC is resigned to a contracting retail opportunity, but need to be practically pragmatic to its implication, whereas the Plan fails to recognise it. 	<p>The Plan identifies Minchinhampton as having the role of a District Centre in town centre and retailing terms, as per the current adopted Local Plan November 2015. EB34 Retail and Town Centre Planning Policy Advice (April 2021) sets out the latest assessment of retail and town centre issues and justification for the Retail Hierarchy identified in CP12. District Centre boundaries remain as defined in the adopted Local Plan November 2015.</p> <p>Justification for the role of Minchinhampton in the development strategy (including its designation as a Tier 2 settlement) is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Paper: The Development Strategy October 2021 (EB4).</p>
	<ul style="list-style-type: none"> • Relationship with Nailsworth and other settlements in the parish: <ul style="list-style-type: none"> ○ Minchinhampton and Nailsworth are adjacent Tier 2 settlements. The plan's strategy for Nailsworth is to enhance its commercial centre and widen its local catchment; a simultaneous strategy of enhancing Minchinhampton as a district centre is demonstrably impractical. The two things are mutually conflicting and therefore 	<p>The Council considers that the development strategy in respect of Minchinhampton, Nailsworth and Brimscombe is complementary, rather than competitive.</p> <p>Both Minchinhampton and Nailsworth are defined as Tier 2 Local Service Centres in the CP3 Settlement Hierarchy. However, the retail and town centre roles of Minchinhampton and Nailsworth are differentiated through the Retail Hierarchy and through their respective settlement summaries (pages 81 and 84), which acknowledge that Nailsworth has a wider functional catchment and a more strategic role than Minchinhampton. EB34 Retail and Town Centre</p>



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	<p>both are not possible.</p> <ul style="list-style-type: none"> ○ Demonstrates a lack of understanding of connectivity, with a strong focus on differentiation and identity. ○ Outlier parts of the parish such as Box and Amberley see Nailsworth as their natural core providers, not Minchinhampton. ○ The Brimscombe Port development will worsen the situation: promoting a community focus there will drag economic and social activity from the residential areas of our Brimscombe ward. 	<p>Planning Policy Advice (April 2021) sets out the latest assessment of retail and town centre issues and justification for the CP12 Retail Hierarchy and key aspects of the development strategy, summarised in section 2.7 of the Plan.</p> <p>Justification for the role of both Minchinhampton and Nailsworth in the development strategy is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71), Retail and Town Centre Planning Policy Advice (April 2021) (EB34), the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Paper: The Development Strategy October 2021 (EB4).</p>
Policy wording modifications:		
	<ul style="list-style-type: none"> ● Re-categorise Minchinhampton as a Tier 3 settlement. 	<p>All suggested policy modifications will be considered by the Inspectors at the EIP.</p>
Wotton-Under-Edge Town Council (696)	<ul style="list-style-type: none"> ● Diagram Fig.3; relationship with Delivery Policy HC4: Wotton-Under-Edge has settlement limits which protect the AONB by preventing development which would encroach on the surrounding hills and valleys. Finding exception sites (Page 57) which do not cause harm to the landscape would be challenging. Policies for protection of the AONB (ES7) and environment (CP15) should explicitly take precedence when considering adjacent to SDL planning applications under Policy CP3. ● Wotton’s (Tier 2) facilities will require improvement to meet the demands arising from any new development in Kingswood and in neighbouring South Gloucestershire. 	<p>Supporting text paragraph 2.9.16 explains that the settlements set out within the CP3 hierarchy all have defined settlement development limits, within and (exceptionally) adjacent to which suitable development may be permitted. The nature and extent of “suitable” development is defined through various Core and Delivery policies, many of which refer directly to the CP3 hierarchy.</p> <p>Necessary infrastructure will be secured in accordance with Core Policy CP6. On-site provision to be incorporated within the overall design scheme; where off-site provision is required, developer contributions can be secured through appropriate planning obligations to mitigate any adverse impacts. In determining the nature and scale of any provision, the Council will have regard to viability considerations and site specific circumstances.</p> <p>Ahead of the EIP, the Council is updating its IDP/Infrastructure and transport</p>



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		evidence base and documentation. This will be published in due course.
	Policy wording modifications: None	
Livedin Custom Build (407)	<ul style="list-style-type: none"> Diagram Fig.3; inconsistent with Delivery Policy HC4: <ul style="list-style-type: none"> Specifying “100% affordable housing” on sites adjoining SDL's in tiers 1,2,3 and 4 (including entry-level homes and affordable self-build/custom build homes) conflicts with NPPF, which says in rural exception scenarios: "A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding". This is later acknowledged in draft policy HC4 (page 235), which states that the inclusion of some market housing on rural exception sites will be considered, on viability grounds. 	<p>The Council considers draft policy HC4 will help to deliver sustainable development and is in conformity with national policy and guidance.</p> <p>Supporting text paragraph 2.9.16 explains that the settlements set out within the CP3 hierarchy all have defined settlement development limits, within and (exceptionally) adjacent to which suitable development may be permitted. The nature and extent of “suitable” development is defined through various Core and Delivery polices, many of which refer directly to the CP3 hierarchy. This includes HC4.</p> <p>Diagram Fig.3 illustrates the practical implications of policies, including HC4, for different tier settlements. It may be necessary to modify Figure 3 to accord more precisely with the wording of HC4.</p>
	Policy wording modifications:	
	<ul style="list-style-type: none"> Suggest this discretion is reflected in policy CP3 to avoid confusion - perhaps by saying 'primarily affordable' rather than "100% affordable" REASON: Compliance with NPPF 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
SDC Cllr Haydn Jones (500)	<ul style="list-style-type: none"> Settlement hierarchy as a means of distributing/apportioning housing growth; relationship to the plan's development strategy: <ul style="list-style-type: none"> I generally support locating larger development adjoining existing higher level communities particularly the Main Settlements (Tier 1) and Local Service Centres (Tier 2). Much more should be made of dispersal to lower tier smaller settlements and those beyond the tier structure where appropriate sites were promoted. This would have aligned with favoured 	<p>The Topic Paper: The Development Strategy (EB4) explains the strategy for the distribution of housing development across the District and the evidence which supports it. Supporting text for Core Policy CP3 explains that the development strategy seeks to prioritise growth at sustainable locations, concentrating housing growth in those settlements that already have a range of services and facilities (as long as there is capacity for growth), and restricting it in those that do not (2.9.15).</p> <p>The Statement of Community Involvement March 2020 (EB2) sets out how Stroud District Council has informed, engaged and consulted people throughout the plan preparation process.</p>



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	responses from residents in the previous consultation phases.	Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including the results of public consultation and sustainability appraisal.
	<ul style="list-style-type: none"> • New Tier 3a settlement at Wisloe: <ul style="list-style-type: none"> ○ Building the new community proposed at PS37 Wisloe was not supported by residents, does not comply with a wide range of national and local policies. ○ Remove PS37 from plan. 	<p>Section 2.4 of the Plan describes how the proposed new settlements at Wisloe and Sharpness fit into the development strategy.</p> <p>The settlement summaries for Newtown & Sharpness (chapter 3, page 169) and for Slimbridge (page 181) explain that the proposed strategic site allocations PS36 and PS37 are not envisaged as extensions to existing settlements, but as distinct new settlements in their own right.</p>
	<ul style="list-style-type: none"> • New Tier 2 settlement at Sharpness: <ul style="list-style-type: none"> ○ Building the extended community at PS36 was not supported by residents at its current proposed scale and its sustainability is not proven without a confirmed, restored rail link. 	Site-specific concerns have been addressed individually through the summary of Regulation 20 responses for proposed site allocations PS36 and PS37.
	<ul style="list-style-type: none"> • Alternative locations for the creation of new settlements: <ul style="list-style-type: none"> ○ Site PGP1 from the Additional Housing Options consultation October 2020 is arguably the best and most sustainable site available. It should be brought into the plan. ○ Site PGP2 from the Additional Housing Options consultation October 2020 should be considered for the plan. 	Comment not relevant to this policy.
	Policy wording modifications: None	
Pegasus Group for Robert Hitchins Ltd (879)	<ul style="list-style-type: none"> • The settlement hierarchy is in principle supported with the exception of Sharpness. 	Comment noted.
	<ul style="list-style-type: none"> • Support the identification of Stonehouse and Cam & Dursley as Tier 1 settlements 	Comment noted.
	<ul style="list-style-type: none"> • Whitminster has the potential to be higher in the settlement hierarchy than a Tier 3a settlement: potentially a Tier 2 settlement. 	Justification for the role of Whitminster in the development strategy, including its Tier 3a designation and the allocation of sites, is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which



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	<ul style="list-style-type: none"> ○ Well located and accessible, providing a range of services and facilities and benefiting from proximity to higher order settlements; and the Stroud District Settlement Role and Function Study Update 2018 notes that there is scope to further improve public transport accessibility. ○ Relatively unconstrained; accessible location; attractive to the market; good availability of land suitable for development. ○ In Tier 3a settlements such as Whitminster, the ability of the settlement to expand to meet local needs should be recognised, as these settlements are relatively sustainable locations for development, offering the best opportunities outside the District's Main Settlements and Local Service Centres for greater self-containment. 	<p>updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p> <p>The Topic Paper: The Development Strategy (EB4) explains the strategy for the distribution of housing development across the District and the evidence which supports lesser levels of growth at tier 3a villages, including Whitminster.</p>
	<ul style="list-style-type: none"> ● Object to Painswick moving from a Tier 3 settlement to Tier 2. ○ The justification for this re-classification is not clear, given that the Sustainability Appraisal (para. 6.87) identifies the settlement as having "high sensitivity to employment or residential development." 	<p>Justification for the role of Painswick in the development strategy (including its designation as a Tier 2 settlement) and the allocation of site PS41 to meet identified local needs arising solely from within the AONB is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: The Development Strategy October 2021 (EB4) and Assessment and selection of sites October 2021 (EB9).</p>
	Policy wording modifications	
	<ul style="list-style-type: none"> ● In relation to Tier 3a settlements: Delete the wording "<i>However, their scope for future growth (in addition to any sites already allocated in this Plan) is constrained.</i>" 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
	<ul style="list-style-type: none"> ● Re-categorise Painswick as a Tier 3 settlement. 	<p>All suggested policy modifications will be considered by the Inspectors at the EIP.</p>
Copperfield for	<ul style="list-style-type: none"> ● Development strategy for Tier 4 settlements: 	<p>The Topic Paper: The Development Strategy (EB4) explains the strategy for the</p>



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Coethrop Farm Ltd (906)	<ul style="list-style-type: none"> ○ The Plan does not identify site allocations within or adjacent to Tier 4 villages. This is not sustainable for Haresfield or the rural community more widely. ○ Allowing for up to only 9 windfall dwellings adjacent to SDL for the whole Local Plan period up to 2040 amounts to a real terms decrease in the local population, as household sizes reduce. ○ Decreasing and ageing population risks loss of services and facilities. ○ Resultant in-commuting to sustain services such as the school ○ The general lack of a strategic approach for smaller villages is not consistent with paragraphs 77 and 78 of the NPPF; The Stroud District Settlement Role and Function Study Update 2018 does not address the impact of decline, but simply categorises villages according to their existing services; does not consider the NPPF requirement to look at combinations of settlements and their proximity and support for collective services, but rather considers each settlement in isolation of its surroundings. 	<p>distribution of housing development across the District and the evidence which supports it. Supporting text for Core Policy CP3 explains that the development strategy seeks to prioritise growth at sustainable locations, concentrating housing growth in those settlements that already have a range of services and facilities (as long as there is capacity for growth), and restricting it in those that do not (2.9.15).</p> <p>The summary strategic approach to growth and development at Tier 4 villages is illustrated in Fig.3.</p> <p>Justification for the role of Haresfield in the development strategy (including its designation as a Tier 4b settlement) and the allocation of sites in accordance with the strategy is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71) and the Topic Papers: The Development Strategy October 2021 (EB4) and Assessment and selection of sites October 2021 (EB9).</p>
<ul style="list-style-type: none"> ● Haresfield village has a role to play in providing development at a scale that is commensurate with the settlement. Development at Harefield should be permitted to support and enhance existing rural services within the village. 		
<p>Policy wording modifications: None</p>		
Black Box Planning for Taylor Wimpey UK Limited (936)	<ul style="list-style-type: none"> ● CP3 Settlement Hierarchy fails to recognise / omits reference to the presence of Gloucester City abutting the district's boundary. 	<p>The relative accessibility from each of Stroud District's defined settlements to employment locations and key services and facilities is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which</p>



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<ul style="list-style-type: none"> • Whilst the opening paragraph of Policy CP3 sets out that locating development in accordance with the settlement hierarchy will reduce the need to travel, the policy ignores the proximity of a major urban area, offering strategic key infrastructure, amenities, services and employment. • The SA (May 2021) recognises the presence of Gloucester City and associated amenities/infrastructure, yet this is not adequately reflected in Policy CP3. 	<p>updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71). The assessment included both an audit of those services and facilities available within each settlement and an assessment of ease of travel/access to key services and facilities within the settlement or elsewhere, including Gloucester.</p> <p>Aside from Hardwicke (Tier 3a) and the anticipated Tier 2 new settlement of Hunts Grove, defined settlements within the parishes on Gloucester’s rural fringe are identified as either Tier 3b (Upton St Leonards) or Tier 4b (Brookthorpe, Haresfield), even accounting for the accessibility ‘boost’ provided by proximity to Gloucester.</p>
<p>Policy CP3 is considered too inward looking and should be revised:</p> <ul style="list-style-type: none"> • Policy CP3 should recognise that certain locations in the District are better located to deliver sustainable development by virtue of their proximity to Gloucester. • Policy CP3 should provide some indication that the parishes on the Gloucester fringe are treated differently to other parishes of similar size in the district, because of their inherent relationship and accessibility to urban Gloucester. (reference to Chapter 3 ‘Making Places’, p139, which acknowledges the role of Gloucester for parishes on Gloucester’s rural fringe). 	<p>The Topic Paper: The Development Strategy (EB4) explains the strategy for the distribution of housing development across the District and the evidence which supports it. Supporting text for Core Policy CP3 explains that, in order to meet the District’s growth and development needs, the development strategy seeks to prioritise growth at sustainable locations, focusing housing towards those settlements that already have a range of services and facilities (as long as there is capacity for growth), and restricting it in those that do not (2.9.15).</p>
<p>The role of site G2 within the settlement hierarchy:</p> <ul style="list-style-type: none"> • Land at Whaddon provides a sustainable option for strategic housing provision in the District, yet the CP3 settlement hierarchy provides little indication of the potential role for such a location in the event that the land is not required by the JCS authorities to meet the needs of Gloucester City. 	<p>Land at Whaddon (Strategic Site Allocation G2) 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. Subject to this, the site will be allocated for a strategic housing development.</p>
<p>Policy wording modifications: None</p>	



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Comment		
Leonard Stanley Parish Council (824)	<ul style="list-style-type: none"> Leonard Stanley PC is deeply concerned that no consideration has been given to the recent levels of 'growth' that Leonard Stanley has already undergone. The proposed allocations are NOT sustainable. Residents have struggled to access services like GPs, dentists and schools. The Plan MUST take into account previous growth as well as future growth The approach taken to Leonard Stanley is at odds with the aims of the settlement hierarchy (reference to para. 2.9.15 on page 54) 	<p>The Topic Paper: The Development Strategy (EB4) explains the strategy for the distribution of housing development across the District and the evidence which supports lesser (non strategic) levels of growth at tier 3a villages, including Leonard Stanley.</p> <p>Supporting text for Core Policy CP3 explains that, in order to meet the District's growth and development needs, the development strategy seeks to prioritise growth at sustainable locations, focusing housing towards those settlements that already have a range of services and facilities (as long as there is capacity for growth), and restricting it in those that do not (2.9.15).</p> <p>Justification for the role of Leonard Stanley in the development strategy, including its Tier 3a designation and the allocation of sites, is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p>
Policy wording modifications: None		
Painswick Parish Council (841)	<ul style="list-style-type: none"> Justification for re-classifying Painswick: <ul style="list-style-type: none"> Painswick PC does not support the re-classification of Painswick as a Tier 2 settlement. Painswick PC asked for evidence to prove that the change from Tier 3 to Tier 2 is justified – no such evidence has been provided. The Review Team 'sold' the need for the Tier change to further enhance the protection of the Retail Centre – it is apparent this was blatant manipulation for the Review Team to get this Council to support the change. Development strategy / scale of growth at Painswick; relationship to CP2 and site allocations: <ul style="list-style-type: none"> Reference to paragraphs 2.3.8 (p23) and 2.5.8 	<p>The Plan identifies Painswick as having the role of a District Centre in town centre and retailing terms, as per the current adopted Local Plan November 2015. EB34 Retail and Town Centre Planning Policy Advice (April 2021) sets out the latest assessment of retail and town centre issues and justification for the Retail Hierarchy identified in CP12. District Centre boundaries remain as defined in the adopted Local Plan November 2015.</p> <p>Justification for the role of Painswick in the development strategy (including its designation as a Tier 2 settlement) and the allocation of site PS41 to meet identified local needs arising solely from within the AONB is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39)</p>



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	<p>(p35), which describe “modest” levels of growth / “modest housing allocations” at named settlements, including Painswick, “in order to meet wider development needs and to support and improve existing services and facilities”.</p> <ul style="list-style-type: none"> ○ These statements are completely misleading, as the site allocations that follow (CP2) bear no relation to the statements above; it is this Council’s belief that these misleading statements will then be used to justify inappropriate development sites at a later stage. 	<p>and the Topic Papers: The Development Strategy October 2021 (EB4) and Assessment and selection of sites October 2021 (EB9).</p> <p>The settlement summary for Painswick (page 219) includes a precis of the development strategy for this settlement: <i>Painswick is a Tier 2 settlement and has a Settlement Development Limit (SDL)... In addition to the allocated site [PS41], infill and re-development is permitted inside the SDL and (exceptionally) adjacent to the SDL (subject to policy criteria), with a view to sustaining or enhancing Painswick’s role and function as a Local Service Centre.</i></p> <p>The Council considers Local Site Allocation PS41 to be of appropriate scale and size to contribute towards meeting current local housing needs of this Tier 2 AONB settlement, in conjunction with modest infill development inside the SDL and (exceptionally) adjacent to it.</p> <p>At Painswick, the development strategy seeks to focus development towards helping to sustain the settlement’s role and function as a “Local Service Centre”, including meeting local housing needs and helping to enhance or deliver new services and facilities which have been identified as lacking (paragraph 2.3.21). Proposals for development in and around Painswick will be viewed through this strategic lens, and assessed against whether or not they accord with the aims of CP3 in respect of the role and function of Tier 2 Local Service Centres. The overarching aims of the development strategy are not expected to be delivered solely through the Plan’s site allocations.</p>
Policy wording modifications: None		
North Nibley Parish Council (875)	<ul style="list-style-type: none"> • North Nibley PC supports North Nibley’s designation as a Tier 3b settlement, where limited infill or redevelopment within the SDL will be permitted and (exceptionally) adjacent to the SDL (subject to Policy criteria including HC4 and DHC2) with a view to sustaining or enhancing the village’s role, function and accessibility as a settlement with local facilities. • North Nibley should be more accurately described as 	<p>Comment noted.</p> <p>The relative accessibility of the North Nibley settlement to key services and</p>



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	having FAIR access to key services and facilities elsewhere, to be consistent with other similar settlements such as Uley, Horsley and Coaley .	facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72).
Policy wording modifications: None		
Chalford Parish Council (909)	<ul style="list-style-type: none"> Chalford PC does not agree with the classification of Chalford as a (single) Tier 3a settlement. The Chalford settlement boundary should be split in two: we can see no logic to keep the Hill and Vale combined as one settlement area, as both the topography (some 600 ft height difference) and road links make these two separate communities. 	Justification for the role of Chalford in the development strategy (including designation as a Tier 3a settlement) is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71) and the Topic Paper: The Development Strategy October 2021 (EB4).
	<ul style="list-style-type: none"> Services and facilities have declined over the past decade: <ul style="list-style-type: none"> Chalford Vale has lost a primary school, a pub (might reopen) and a post office; Chalford Hill has lost a Church (closing Easter 2022), a butcher shop and an electrical store. The services, facilities and accessibility of the two combined communities (Hill and Vale) are not comparable with those of Manor Village (also Tier 3a). 	The relative accessibility from each of Stroud District’s defined settlements to key local and strategic services and facilities is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71). The assessment included both an audit of those services and facilities available within each settlement at the time and an assessment of ease of travel/access to key services and facilities within the settlement or elsewhere.
	<ul style="list-style-type: none"> Settlement development limits: <ul style="list-style-type: none"> Although the concept of settlement boundaries is unchanged, there is now much more leeway given to permitting development outside (adjoining) the boundary. This is set out in DCH2 and applies to Tier 3b and Tier 4 settlements. We feel that this change of policy is misguided. It will make it very much easier for developers to build outside the village boundaries and in practice will render settlement boundaries porous and almost impossible to defend. The green corridor separating Bussage (“Manor 	<p>The Plan’s strategic approach to settlement development limits is evidenced through the discussion paper Review of Settlement Development Limits (April 2018) (EB74).</p> <p>Supporting text paragraph 2.9.16 explains that the settlements set out within the CP3 hierarchy all have defined settlement development limits, within and (exceptionally) adjacent to which suitable development may be permitted. The nature and extent of “suitable” development is defined through various Core and Delivery polices, many of which refer directly to the CP3 hierarchy.</p>



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	<p>Village”) and Chalford is an important and ecological feature, which has proved vulnerable to development pressure in the recent past. This should remain inviolate. This should be made more explicit in the delivery policies.</p>	
	Policy wording modifications: None	
Kingswood Parish Council (956)	<ul style="list-style-type: none"> • Kingswood (Tier 3a) should be downgraded to a smaller settlement status <ul style="list-style-type: none"> ○ The Stroud District Settlement Role and Function Study Update has wrongfully classified Kingswood as a Tier 3a settlement. This classification is not reflective of Kingswood’s role within the district. ○ the Stroud District Settlement Role and Function Study Update relies on Kingswood’s close proximity to Wotton-under-Edge (a Tier 2 settlement) ○ Further evidence required to clarify the rating ‘tiers’ of the Settlement Hierarchy. 	<p>Justification for the role of Kingswood in the development strategy, including its designation as a Tier 3a settlement, is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71) and the Topic Paper: The Development Strategy October 2021 (EB4).</p>
	<ul style="list-style-type: none"> • Development strategy / scale of growth at Kingswood; relationship to CP2 and site allocations: <ul style="list-style-type: none"> ○ The wrongful classification of Kingswood as a Tier 3a settlement has led to disproportionately high levels of growth being allocated, compared to other settlements within Stroud District. As such, the Stroud Local Plan is unsound on the grounds that it has been poorly prepared and has failed to provide an accurate strategy which meets the area’s objectively assessed needs, as per paragraph 36 of the NPPF. ○ Wotton-under-Edge (Tier 2) is allocated no additional housing over the Plan period; whereas it is clear that the decision to allocate growth 	<p>Justification for the roles of Kingswood and Wotton-Under-Edge in the development strategy (including their designation as Tier 3a and Tier 2 respectively) and the allocation of sites in accordance with the strategy is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71) and the Topic Papers: The Development Strategy October 2021 (EB4) and Assessment and selection of sites October 2021 (EB9).</p> <p>The development strategy for the Wotton Cluster is summarised on page 199, while the strategy implications for both Kingswood and Wotton-Under-Edge are summarised in their respective settlement summaries (p204 and p209). It is made clear that, despite its Tier 2 role and function, there are no proposed site allocations for Wotton, due to environmental constraints around the</p>



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	<p>within Kingswood is on the basis that it is a Tier 3a settlement in close proximity to Wotton.</p> <ul style="list-style-type: none"> ○ Particular reference is made to the disparity in services, facilities and accessibility between Kingswood (Tier 3a) and Wotton-Under-Edge (Tier 2); and the poor actual connectivity and transport links between the two, despite proximity. ○ The level of growth proposed, coupled with the lack of existing infrastructure in Kingswood, would lead to considerable strains on existing services, resulting in an erosion of Kingswood’s overall vitality and viability. 	<p>town, including the AONB designation.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape sensitivity and accessibility.</p> <p>The relative accessibility of site PS38 and the wider Kingswood settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p>
Policy wording modifications: None		
SDC Cllr Christopher Jockel (863)	<ul style="list-style-type: none"> ● Object to the classification of Chalford as a (single) Tier 3a settlement. <ul style="list-style-type: none"> ○ Chalford Hill and Chalford Valley should be viewed as functionally different settlements for the purposes of planning and housing allocation; both should be designated as Tier 3b ○ We acknowledge that the officers consider that the division of Chalford Hill and Chalford Valley into 2 separate settlements for the purposes of the plan is still not justified (and in fact their current Tier 3a status wouldn't change if they were). ● On the ground knowledge of the local situation leads us to strongly question the drawing of settlement boundaries and the assignment of tiers to settlements in the Chalford Parish in the Gloucestershire Local Housing Needs Assessment Sept 2020. ● Assessment of services, facilities and accessibility: 	<p>The Plan’s strategic approach to settlement development limits is evidenced through the discussion paper Review of Settlement Development Limits (April 2018) (EB74).</p> <p>Justification for the role of Chalford in the development strategy (including designation as a Tier 3a settlement) is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71) and the Topic Paper: The Development Strategy October 2021 (EB4).</p> <p>It is not through the Gloucestershire Local Housing Needs Assessment Sept 2020 (EB10) that the settlements in Chalford parish have been assigned to settlement hierarchy tiers.</p>
	<ul style="list-style-type: none"> ● Assessment of services, facilities and accessibility: 	<p>The relative accessibility from each of Stroud District’s defined settlements to</p>



Core Policy CP3 - Settlement Hierarchy		
	<ul style="list-style-type: none"> ○ Challenge the assumptions and resultant outputs of the Stroud District Settlement Role and Function Study ○ Topography represents a significant physical barrier for active travel based access to services ○ Levels of services and facilities are overstated and/or outdated (reference to primary school, post office, frequency of public transport) ○ Historic over allocation of housing to the wider Chalford Parish (at Manor Village) has outpaced the provision of local infrastructure, facilities and services. 	<p>key local and strategic services and facilities is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71). The assessment included both an audit of those services and facilities available within each settlement and an assessment of ease of travel/access to key services and facilities within the settlement or elsewhere.</p>
	<ul style="list-style-type: none"> ● Settlement hierarchy and general policy approach to settlements in Chalford Parish: <ul style="list-style-type: none"> ○ The mosaic of settlements and green spaces that make up wider Chalford Parish is the key characteristic of the location, and this should be primary policy of the local plan for all the settlements in the Chalford parish cluster and spaces between’ ○ The current designation of Chalford as a single settlement (in the current 2015 SDLP) has demonstrably failed to guide, control or stop speculative developer-led development and therefore holds little promise that it can do it in the future and so is failing in one of its primary purposes; ○ The correctly weighted priority of the local plan in the Parish should be on protecting existing and developing sustainable new local infrastructure, facilities, and services for the existing population; and for their contemporary and low carbon future employment needs to be consistent with the 	<p>The Plan’s strategic approach to settlement development limits is evidenced through the discussion paper Review of Settlement Development Limits (April 2018) (EB74).</p> <p>Supporting text paragraph 2.9.16 explains that the settlements set out within the CP3 hierarchy all have defined settlement development limits, within and (exceptionally) adjacent to which suitable development may be permitted. The nature and extent of “suitable” development is defined through various Core and Delivery polices, many of which refer directly to the CP3 hierarchy.</p> <p>The Council considers draft policy CP3 will help to deliver sustainable development. Supporting text for Core Policy CP3 explains that the development strategy seeks to prioritise growth at sustainable locations, concentrating housing growth in those settlements that already have a range of services and facilities (as long as there is capacity for growth), and restricting it in those that do not (2.9.15).</p>



Core Policy CP3 - Settlement Hierarchy		
	CN2030 plan and SDCs over all objectives for the district	
	Policy wording modifications:	
	<ul style="list-style-type: none"> Modify the Chalford SDL. Re-categorise Chalford as two Tier 3b settlements. 	All suggested policy modifications will be considered by the Inspectors at the EIP.
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> Support for Dursley's classification as a Tier 1 settlement Development strategy / scale of growth at Dursley; relationship to CP2 and site allocations: <ul style="list-style-type: none"> The lack of any additional housing allocations at Dursley brings into doubt the aims of this policy. The Stroud District Settlement Role and Function Study (page 69 onwards) notes that Dursley has experienced "Extremely low housing growth" and that physical and environmental constraints make any "significant expansion" of the town difficult. The Study clearly identifies an issue with Dursley, which needs to be addressed. 	<p>Comment noted.</p> <p>Justification for the roles of Cam and Dursley in the development strategy (including their designation as a Tier 1 settlement) and the allocation of sites in accordance with the strategy is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71) and the Topic Papers: The Development Strategy October 2021 (EB4) and Assessment and selection of sites October 2021 (EB9).</p> <p>The development strategy for the Cam & Dursley Cluster is summarised on page 117, while the strategy implications for both Cam and Dursley are summarised in their respective settlement summaries (p122 and p133). It is made clear that, despite its Tier 1 role and function, there are no proposed strategic-scaled site allocations for Dursley, due to environmental constraints around the town, including the AONB designation.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape sensitivity and accessibility.</p>
	Policy wording modifications: None	
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> Support for the Policy's position that Cam is a Tier 1 settlement, and it is the Council's primary focus for jobs and development. 	Comment noted.
	Policy wording modifications: None	
Chilmark Consulting	<ul style="list-style-type: none"> Diagram Fig.3: 	The Council believes that both a very high level of housing need and the

Core Policy CP3 - Settlement Hierarchy		
for Charterhouse Strategic Land (865)	<ul style="list-style-type: none"> ○ Fig. 3 is not justified – with respect to the requirement for 30% affordable housing contributions from sites of four or more dwellings in the Tier 2 Local Service Centres of Minchinhampton, Painswick and Wotton-Under-Edge. (See CSL’s representation on Core Policy CP9); ○ Fig. 3 is not effective – the status of Fig.3 is not clearly articulated. It is unclear whether Fig.3 forms part of Policy CP3 or is merely supporting information to inform the policy. Neither the Policy wording nor the supporting text at paragraph 2.9.14 – 2.9.19 cross-references to Fig.3. Furthermore, the need for Fig.3 to be included within the Local Plan at all is questioned, given it appears to simply summarise some of the other relevant Plan policies directing and restricting future growth. 	<p>limited supply of land for housing justify a low threshold for affordable housing provision (para. 4.21). Core Policy CP9 requires that sites lying within the Cotswolds Area of Outstanding Natural Beauty or any of the designated rural areas (parishes) listed will be required to provide at least 30% affordable housing, if they are capable of providing 4 or more dwellings (net). In all other parts of the District, a higher threshold of 10 dwellings or a site area of 0.5 hectares applies.</p> <p>Diagram Fig.3 reflects the practical implications of CP9, by distinguishing between settlements lying within the AONB and/or designated rural parishes, and those lying outside.</p> <p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.</p>
	<ul style="list-style-type: none"> ● Support Painswick’s classification as a Tier 2 ‘Local Service Centre’; this properly recognises the importance of the settlement and centre within the Cotswold Cluster 	<p>Comment noted.</p>
	<ul style="list-style-type: none"> ● Development strategy / scale of growth at Painswick; relationship to CP2 and site allocations: <ul style="list-style-type: none"> ○ Plan for and allocate a greater level of housing (and potentially business space), to ensure that the future of Painswick and the Cotswold Cluster does reflect the Vision (set out in Section 3.8 of the Plan): ○ Issues identified in the evidence base (Stroud District Settlement Role and Function Study Update) – including ageing and reducing population, increasing economic inactivity, 	<p>Justification for the role of Painswick in the development strategy (including its designation as a Tier 2 settlement) and the allocation of site PS41 to meet identified local needs arising solely from within the AONB is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71), the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: The Development Strategy October 2021 (EB4) and Assessment and selection of sites October 2021 (EB9).</p> <p>The development strategy for the Cotswold Cluster is summarised on page 211, while the strategy implications for Painswick are summarised in the</p>



Core Policy CP3 - Settlement Hierarchy		
	<p>dormitory role/lack of employment function, housing unaffordability, social exclusion and erosion of services and facilities – are acknowledged within the plan, but not adequately addressed in terms of solutions.</p> <ul style="list-style-type: none"> ○ The level of housing growth allocated to Painswick (up to 20 dwellings at PS44 – representing a growth rate of one dwelling per year over the plan period) is not sufficient to support sustainable patterns of living or to address the settlement’s demographic, economic and social challenges. 	<p>settlement summary on page 219. It is made clear that, despite its Tier 2 role and function, there are limited opportunities for site allocations at Painswick, due to landscape and environmental constraints, including the AONB designation.</p> <p>The Council considers Local Site Allocation PS41 to be of appropriate scale and size to contribute towards meeting the current local housing needs of this Tier 2 AONB settlement, in conjunction with modest infill development inside the SDL and (exceptionally) adjacent to it.</p>
Policy wording modifications:		
	<p>Modification to Figure 3. The Plan should be modified by either:</p> <ul style="list-style-type: none"> • a) deletion of Figure 3 in its entirety; or • b) modification of Policy CP3 and supporting text to clearly articulate the purpose and status of Figure 3. • If Figure 3 is retained, then the Tier 2 Local Service Centre diagram should be amended to remove reference to 30% affordable housing on sites of four or more dwellings (unless and until there is clear evidence to support this requirement – see CSL’s separate representation on Policy CP9) 	<p>All suggested policy modifications will be considered by the Inspectors at the EIP.</p>
Avison Young for the Nuclear Decommissioning Authority (872)	<ul style="list-style-type: none"> • It is acknowledged that this policy states that a detailed policy framework will steer the type and quantity of development in Berkeley, at the smaller defined settlements and in the countryside. 	<p>Comment noted (relates to Chapter 3 ‘Making places’ – Berkeley Cluster: summary of ‘the strategy’ 3.5.1 and Vision 3.5.2).</p>
	<ul style="list-style-type: none"> • The closure of Berkeley Nuclear Power Station is also noted as having an impact on local employment opportunities, which is acknowledged and welcomed. 	<p>Comment noted (relates to Chapter 3 ‘Making places’ – Berkeley Cluster: ‘Where are we now?’ 3.5.3).</p>
Policy wording modifications: None		
RCA Regeneration	<ul style="list-style-type: none"> • Development strategy for Tier 3b settlements: 	<p>The Council considers draft policy CP3 will help to deliver sustainable</p>



Core Policy CP3 - Settlement Hierarchy		
Ltd for Land Development and Estates Ltd (861)	<ul style="list-style-type: none"> We are broadly supportive of this policy, but we see no reason why there should not be site allocations in Tier 3b settlements. This is because rural exception sites are an inevitability, so the plan should positively reflect this need by allocating sites from the beginning of the plan process, rather than waiting for the need to be exacerbated by a lack of deliverability. Especially since smaller settlements are likely to be most unaffordable. 	<p>development. Supporting text for Core Policy CP3 explains that the development strategy seeks to prioritise growth at sustainable locations, concentrating housing growth in those settlements that already have a range of services and facilities (as long as there is capacity for growth), and restricting it in those that do not (2.9.15).</p> <p>The Topic Paper: The Development Strategy (EB4) explains the strategy for the distribution of housing development across the District and the evidence which supports more limited levels of growth at Tier 3b villages.</p>
	<ul style="list-style-type: none"> We consider that a moderate scale housing development within North Nibley (Tier 3b) would be appropriate ensure the continued viability of North Nibley C of E Primary School. 	<p>The Topic Paper: The Development Strategy (EB4) explains the strategy for the distribution of housing development across the District and the evidence which supports more limited levels of growth at Tier 3b villages, including North Nibley.</p>
	<p>Policy wording modifications: None</p>	
RCA Regeneration Ltd for Piper Homes (877)	<ul style="list-style-type: none"> Development strategy for Tier 3b settlements: <ul style="list-style-type: none"> We are broadly supportive of this policy, but we see no reason why there should not be site allocations in Tier 3b settlements. This is because rural exception sites are an inevitability, so the plan should positively reflect this need by allocating sites from the beginning of the plan process, rather than waiting for the need to be exacerbated by a lack of deliverability. Especially since smaller settlements are likely to be most unaffordable. 	<p>The Council considers draft policy CP3 will help to deliver sustainable development. Supporting text for Core Policy CP3 explains that the development strategy seeks to prioritise growth at sustainable locations, concentrating housing growth in those settlements that already have a range of services and facilities (as long as there is capacity for growth), and restricting it in those that do not (2.9.15).</p> <p>The Topic Paper: The Development Strategy (EB4) explains the strategy for the distribution of housing development across the District and the evidence which supports more limited levels of growth at Tier 3b villages.</p>
	<p>Policy wording modifications: None</p>	
McLoughlin Planning for Seven Homes (880)	<ul style="list-style-type: none"> Support the identification of Frampton-on-Severn as a Tier 3a location for development 	<p>Comment noted.</p>
	<ul style="list-style-type: none"> Development strategy for Tier 3a settlements, specifically Frampton-on-Severn: <ul style="list-style-type: none"> Concern over the policy wording that states: “...However, their scope for future growth (in 	<p>The Council considers draft policy CP3 will help to deliver sustainable development. Supporting text for Core Policy CP3 explains that the development strategy seeks to prioritise growth at sustainable locations, concentrating housing growth in those settlements that already have a range</p>



Core Policy CP3 - Settlement Hierarchy		
	<p>addition to any sites already allocated in this Plan) is constrained.” This is unsound in its approach, in respect of Frampton on Severn, this is not the case.</p> <ul style="list-style-type: none"> ○ The allocation for 30 dwellings is considered to conflict with national guidance about making best use of land. ○ Seven Homes’ position is that the allocation and number proposed in 3a locations is not the ‘last word’ on the development potential at the village and that opportunities exist to increase the level of development, without compromising other policy objectives. 	<p>of services and facilities (as long as there is capacity for growth), and restricting it in those that do not (2.9.15).</p> <p>The Topic Paper: The Development Strategy (EB4) explains the strategy for the distribution of housing development across the District and the evidence which supports lesser levels of growth at Tier 3a villages, including Frampton-on-Severn. The Council considers Local Site Allocation PS44 to be of appropriate scale and size for Tier 3a Frampton, in conjunction with modest infill development inside the SDL and (exceptionally) adjacent to it.</p> <p>Supporting text paragraph 2.9.16 explains that the settlements set out within the CP3 hierarchy all have defined settlement development limits, within and (exceptionally) adjacent to which suitable development may be permitted. The nature and extent of “suitable” development is defined through various Core and Delivery policies, allowing for holistic consideration of settlement-specific needs, opportunities and constraints.</p>
Policy wording modifications: None		
<p>Minchinhampton Local Plan Response Group (891)</p>	<ul style="list-style-type: none"> ● We do not consider the Plan is sound because it is not based on proportionate evidence with respect to Minchinhampton’s designation as a Tier 2 settlement. In summary: <ul style="list-style-type: none"> ○ Minchinhampton Parish council disputes Minchinhampton’s status as a Tier 2 settlement; ○ Minchinhampton has too few services, facilities and retail outlets to justify Tier 2 status, with infrastructure that will limit growth due to the narrow, congested streets and lack of parking; ○ Minchinhampton’s range of services, facilities and retail outlets does not compare with other Tier 2 settlements. Minchinhampton and Nailsworth are very different, it is impossible to understand how Minchinhampton has been ranked as a Tier 2 settlement alongside Nailsworth. ○ Gloucestershire County Council do not treat 	<p>Justification for the role of both Minchinhampton and Nailsworth in the development strategy is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which updates and supplements the evidence in the earlier 2014 Stroud District Settlement Role and Function Study, EB71), Retail and Town Centre Planning Policy Advice (April 2021) (EB34), the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Paper: The Development Strategy October 2021 (EB4).</p> <p>Both Minchinhampton and Nailsworth are defined as Tier 2 Local Service Centres in the CP3 Settlement Hierarchy. However, the retail and town centre roles of Minchinhampton and Nailsworth are differentiated through the Retail Hierarchy and through their respective settlement summaries (pages 81 and 84), which acknowledge that Nailsworth has a wider functional catchment and a more strategic role than Minchinhampton.</p>



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	Minchinhampton as a Tier 2 settlement and it does not receive the investment priority received by other Tier 2 settlements.	
Policy wording modifications: None		
Rapleys LLP for Crest Nicholson Land and Partnerships (897)	<ul style="list-style-type: none"> Support Hunts Grove's classification as (anticipated) Tier 2 Local Service Centre 	Comment noted.
	<ul style="list-style-type: none"> Development strategy for Tier 2 settlements, specifically Hunts Grove: <ul style="list-style-type: none"> There is a potential anomaly arising from the use of the term 'modest' as a description of the level of growth deemed appropriate at Tier 2 Local Service Centres, if Hunts Grove is included within this category: an allocation of 750 new homes to be delivered at Hunts Grove via an extension to the existing settlement is clearly not a 'modest' level of growth. Therefore, to make the Policy justified and effective the descriptor should be removed. The wording of the policy can function satisfactorily without use of the term and therefore it should be deleted. 	<p>Section 2.4 of the Plan describes how the proposed new settlements at Hunts Grove, Wisloe and Sharpness fit into the development strategy. The Plan anticipates that Hunts Grove will ultimately include sufficient local facilities to achieve Local Service Centre status (Tier 2) in the future (2.4.7).</p> <p>Supporting text for CP3 explains that the new settlements are not included within the settlement hierarchy at present and the scale and nature of their growth and development is determined through their respective site allocation policies and subsequent planning applications. However, once development is sufficiently advanced to establish their anticipated role and function, it is expected that (through a future Local Plan Review) they will be defined as settlements in their own right, with settlement development limits, and CP3 will then apply.</p>
	Policy wording modifications:	
	<ul style="list-style-type: none"> Delete the words "modest levels" in reference to the provision of jobs and homes at Tier 2 settlements. 	All suggested policy modifications will be considered by the Inspectors at the EIP.
BBA Architects for Vistry Group (912)	<ul style="list-style-type: none"> The classification of settlements in to different tiers depending on their size, transport infrastructure and levels of facilities and services is generally a useful tool in determining the most suitable and sustainable location for new development. 	Comment noted.
	<ul style="list-style-type: none"> Justification for Tier 3a classification / assessment of services, facilities and accessibility at Kingswood: <ul style="list-style-type: none"> Designation as a Tier 3a settlement underestimates Kingswood's role and function as a sustainable settlement and fails to recognise 	Justification for the roles of Kingswood and Wotton-Under-Edge in the development strategy (including their designation as Tier 3a and Tier 2 respectively) and the allocation of sites in accordance with the strategy is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) (which updates and supplements the evidence in the earlier



Core Policy CP3 - Settlement Hierarchy		
	<p>the relationship between Kingswood and Tier 2 Wotton-under-Edge.</p> <ul style="list-style-type: none"> ○ Four strategic level services which have been attributed to Wotton Under Edge (secondary school, sixth form, sports centre and swimming pool) are all within 500m of Kingswood. ○ Kingswood has better access to strategic level services than a number of Tier 2 settlements. ○ Kingswood has a strong employment role. 	<p>2014 Stroud District Settlement Role and Function Study, EB71) and the Topic Papers: The Development Strategy October 2021 (EB4) and Assessment and selection of sites October 2021 (EB9).</p> <p>The development strategy for the Wotton Cluster is summarised on page 199, while the strategy implications for both Kingswood and Wotton-Under-Edge are summarised in their respective settlement summaries (p204 and p209). It is made clear that, despite its Tier 2 role and function, there are no proposed site allocations for Wotton, due to environmental constraints around the town, including the AONB designation.</p>
	<ul style="list-style-type: none"> ● Distribution of strategic growth and relationship to CP2: <ul style="list-style-type: none"> ○ The purpose of Core Policy CP3 and the designation of settlements into a hierarchy is intended to ensure that development is directed to the most sustainable settlements. However, Tier 2 Wotton is constrained; instead, growth should be directed to Kingswood. ○ The designation of Kingswood as a Tier 3a settlement without a statement within the policy to say that Tier 3 settlements can help meet the needs of more constrained Tier 1 and Tier 2 settlements is not sound as it not justified and will render the plan ineffective. There will be an insufficient distribution of housing across the plan area and the plan will fail to meet the issues and top priorities for the Wotton cluster recognised within the plan. ○ To make the plan sound, Core Policy CP3 should be amended to either: <ul style="list-style-type: none"> a) Include Kingswood as a Tier 2 settlement, recognising its shared facilities with Wotton-under-Edge, or b) Recognise the connection between Kingwood 	<p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape sensitivity and accessibility.</p> <p>The relative accessibility of all settlements and all potential sites to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b). The settlement assessment included both an audit of those services and facilities available within each settlement and an assessment of ease of travel/access to key services and facilities within the settlement or elsewhere.</p>



Core Policy CP3 - Settlement Hierarchy		
	and Wotton-under-Edge , and the inability of Wotton-under-edge to deliver an appropriate amount of housing and reinstate the reference within the Draft Local plan 2019 to Tier 3a settlements helping to meet housing needs of more constrained Tier 1 or Tier 2 settlements.	
	Policy wording modifications:	
	Core Policy CP3 should be amended to either: <ul style="list-style-type: none"> • Include Kingswood as a Tier 2 settlement, or • Reinststate the reference that appeared within the Draft Local Plan 2019 to Tier 3a settlements helping to meet housing needs of more constrained Tier 1 or Tier 2 settlements. 	All suggested policy modifications will be considered by the Inspectors at the EIP.
David Lock Associates for Hallam Land Management (915)	<ul style="list-style-type: none"> • Support the proposed hierarchy for growth and development across the District's settlements. 	Comment noted.
	<ul style="list-style-type: none"> • Support for the designation of Cam and Dursley, Stonehouse and Stroud as Tier 1 'Main Settlements' and therefore the primary focus for growth and development. 	Comment noted.
	<ul style="list-style-type: none"> • HLM consider the settlement development limit in relation to Cam and Dursley should be reassessed in order to better reflect not only the Council's intention that this is a location for strategic housing growth (as indicated on Map 3 Development Strategy, and Map 4 Spatial Vision), but to also reflect the permissions granted and built development, both existing and under construction. 	Policies CP2 and CP3 make clear that development will take place within settlement development limits, at development sites allocated in the SDLP (some of which are conceived as planned urban extensions or new settlements in their own right), and that limited development will occur outside SDLs, in accordance with other policies of the Plan. The main reason why allocated sites are not shown within SDLs is that they are yet to be developed and the intention behind SDLs is to define the current extent of existing settlements. If an allocated site were not to come forward in a comprehensively planned manner, inclusion of the site within SDLs could allow for a smaller speculative scheme to be justified in a manner contrary to the aims of SDLs and the Local Plan. Once development has been completed, the Cam and Dursley settlement development limits may be amended to reflect the revised built extent of development, as part of a comprehensive



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		<p>review.</p> <p>The Plan's strategic approach to settlement development limits is evidenced through the discussion paper Review of Settlement Development Limits (April 2018) (EB74).</p>
	Policy wording modifications:	
	<ul style="list-style-type: none"> Modify the Cam & Dursley SDL. 	All suggested policy modifications will be considered by the Inspectors at the EIP.
RPS Group for Stroud Corporation NV (917)	<ul style="list-style-type: none"> RPS welcomes the policy approach which supports the redevelopment of previously developed land and buildings within the settlement boundary. 	Comment noted.
	<ul style="list-style-type: none"> Diagram Fig.3 (relationship to CP9): <ul style="list-style-type: none"> Brimscombe & Thrupp is identified as a Tier 3a 'Accessible Settlement with Local Facilities'. The diagram on page 57 states that within Tier 3a and 3b settlements and including on allocated sites, there should be at least 30% affordable housing on all sites capable of providing 4 or more dwellings. the diagram on page 57 should be consistent with Core Policy CP9 and the national policy guidance on affordable housing requirement: the affordable housing threshold for development in Tier 3a and 3b settlements should be 10 or more dwellings, rather than 4 dwellings, and the provision of affordable housing should be subject to negotiation underpinned by viability 	<p>The Council believes that both a very high level of housing need and the limited supply of land for housing justify a low threshold for affordable housing provision (para. 4.21). Core Policy CP9 requires that sites lying within the Cotswolds Area of Outstanding Natural Beauty or any of the designated rural areas (parishes) listed will be required to provide at least 30% affordable housing, if they are capable of providing 4 or more dwellings (net). In all other parts of the District, a higher threshold of 10 dwellings or a site area of 0.5 hectares applies.</p> <p>Diagram Fig.3 reflects the practical implications of CP9, by distinguishing between settlements lying within the AONB and/or designated rural parishes, and those lying outside.</p> <p>Diagram Fig.3 identifies Hardwicke, Kings Stanley and Leonard Stanley as the only Tier 3a or 3b settlements where the higher thresholds apply. However, Brimscombe & Thrupp CP is not one of the designated rural areas listed in CP9, and the majority of the Brimscombe & Thrupp SDL lies outside the Cotswolds AONB.</p>
	Policy wording modifications:	
	<p>Modification to Figure 3: Within and adjoining SDL – Including on allocated sites</p> <ul style="list-style-type: none"> At Hardwicke, Kings Stanley and Leonard Stanley, <u>Tier 3a and 3b settlements</u>, at least 30% affordable 	<p>It may be necessary to modify Figure 3 to add Brimscombe & Thrupp to the list of those Tier 3 settlements where a threshold of 10 dwellings applies.</p> <p>All other suggested policy wording modifications will be considered by the</p>



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	<p>housing on all sites capable of providing 10 or more dwellings. <u>The provision of affordable housing should be subject to negotiation underpinned by viability.</u></p> <ul style="list-style-type: none"> At all other Tier 3a and 3b settlements, at least 30% affordable housing on all sites capable of providing 4 or more dwellings. 	Inspectors at the EIP.
RPS Group for Redrow Homes Ltd (948)	<ul style="list-style-type: none"> Hardwicke settlement development limit: <ul style="list-style-type: none"> The proposed SDL for Hardwicke does not include strategic site G1 Land to the South of Hardwicke within the defined settlement boundary. The strategic sites being located outside of defined SDL would appear to conflict with Policy CP15. It is therefore considered that on a matter of soundness and to avoid any doubt or inconsistencies, the boundary of the strategic sites should be included with the defined settlement limits of the Local Plan policy maps. 	<p>Policies CP2 and CP3 make clear that development will take place within settlement development limits, at development sites allocated in the SDLP (some of which are conceived as planned urban extensions or new settlements in their own right), and that limited development will occur outside SDLs, in accordance with other policies of the Plan. The main reason why allocated sites are not shown within SDLs is that they are yet to be developed and the intention behind SDLs is to define the current extent of existing settlements. If an allocated site were not to come forward in a comprehensively planned manner, inclusion of the site within SDLs could allow for a smaller speculative scheme to be justified in a manner contrary to the aims of SDLs and the Local Plan. Once development has been completed, the Hardwicke settlement development limit may be amended to reflect the revised built extent of development, as part of a comprehensive review.</p> <p>The Plan’s strategic approach to settlement development limits is evidenced through the discussion paper Review of Settlement Development Limits (April 2018) (EB74).</p>
	<ul style="list-style-type: none"> Diagram Fig.3 (relationship to HC3): <ul style="list-style-type: none"> The diagram outlines that within Main Settlements (Tier 1) and Local Service Centres (Tier 2), a minimum of 2% of dwellings on strategic sites should be self-build/custom build. No such requirement is included for Tier 3 or Tier 4 Settlements. Hardwicke is classified as a Tier 3a settlement and therefore, on the basis of the wording of Policy CP3, Strategic Site G1 – Land to the South 	<p>The Council considers draft policy HC3 will help to deliver sustainable development and its requirement for a minimum of 2% of the dwellings to be provided as plots suitable for self- or custom-build on all strategic sites allocated within the Local Plan is in conformity with national policy and guidance.</p> <p>Diagram Fig.3 illustrates the practical implications of policies, including HC4, for different tier settlements. It may be necessary to modify Figure 3 to accord more precisely with the wording of HC4.</p>



Core Policy CP3 - Settlement Hierarchy		
	<p>of Hardwicke should not have a requirement for self-build plots.</p> <ul style="list-style-type: none"> ○ Policy HC3 (Self-build and custom-build housing provision) however seems to require the provision of self-build plots on strategic sites regardless of their location or settlement hierarchy which contradicts with the strategy set out in Policy CP3. ○ Clarify whether self-build plots should be required across all strategic sites or just focussed within Tier 1 and Tier 2 settlements. ○ Policy HC3 should be re-worded to just refer to Tier 1 and Tier 2 settlements, to reflect the council's strategy of only support self build plots within the most sustainable settlements. 	
	Policy wording modifications:	
	<ul style="list-style-type: none"> • Modify the Hardwicke SDL. 	All suggested policy modifications will be considered by the Inspectors at the EIP.
Other representations	Issues raised	Stroud District Council Response
Designation of Painswick as a Tier 2 settlement:		
922	<ul style="list-style-type: none"> • You have clearly made a mistake with the tiering for Painswick 	Justification for the role of Painswick in the development strategy, including its designation as a Tier 2 settlement, is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), which updates and supplements the evidence in the earlier Stroud District Settlement Role and Function Study 2014 (December 2014) (EB71).
Growth strategy for Tier 3a Newtown & Sharpness:		
489	<ul style="list-style-type: none"> • In general, all the settlements identified in Core Policy CP3 as having settlement boundaries are suitable for some level of growth; but the scale and nature of that development needs to relate to the existing settlement. • A proportionate level of growth at Sharpness would 	The Council considers the proposed Local Site Allocation PS34 to be of appropriate scale and size for this Tier 3a settlement. Justification for the role of Newtown & Sharpness in the development strategy (including its Tier 3a classification) and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development



Core Policy CP3 - Settlement Hierarchy		
	<p>be acceptable, bearing in mind the size of the Newtown & Sharpness settlement and the services/facilities it provides</p> <ul style="list-style-type: none"> Strategic site allocation PS36: it is the scale of growth that is totally wrong. 	<p>Strategy October 2021 (EB4).</p> <p>The settlement summary for Newtown & Sharpness (chapter 3, page 169) explains that the proposed strategic site allocations PS36 is not envisaged as an extension to the existing Newtown & Sharpness settlement, but as distinct new Tier 2 settlement in its own right.</p>
Creation of new settlements at Wisloe and Sharpness		
489	<ul style="list-style-type: none"> The growth points allocated in CP2 at Sharpness and Wisloe will not provide the most sustainable developments In general, all the settlements identified in Core Policy CP3 as having settlement boundaries are suitable for some level of growth. Notably, Wisloe is not one of these and it isn't even a settlement defined in the LP 	<p>Section 2.4 of the Plan describes how the proposed new settlements at Wisloe and Sharpness fit into the development strategy.</p> <p>The settlement summaries for Newtown & Sharpness (chapter 3, page 169) and for Slimbridge (page 181) explain that the proposed strategic site allocations PS36 and PS37 are not envisaged as extensions to existing settlements, but as distinct new settlements in their own right.</p> <p>Supporting text for CP3 explains that the new settlements at Sharpness and Wisloe are not included within the settlement hierarchy at present and the scale and nature of their growth and development is determined through their respective site allocation policies and subsequent planning applications. However, once development is sufficiently advanced to establish their anticipated role and function, it is expected that (through a future Local Plan Review) they will be defined as settlements in their own right, with settlement development limits, and CP3 will then apply.</p>
Cam & Dursley settlement development limit		
888	<ul style="list-style-type: none"> Proposed change to the Cam & Dursley SDL to include the garden of Hawthorn Villa, Woodmancote, Dursley. Note previous representations to the Stroud District Local Plan Review – Draft Plan 2019 Consultation (Regulation 18, November 2019). The council have noted our previous submission, but have not provided detail as to the features that would prevent the alteration to the SDL as suggested. 	<p>The Plan's strategic approach to settlement development limits is evidenced through the discussion paper Review of Settlement Development Limits (April 2018) (EB74).</p> <p>Policies CP2 and CP3 make clear that development will take place within settlement development limits, at development sites allocated in the SDLP (some of which are conceived as planned urban extensions or new settlements in their own right), and that limited development will occur outside SDLs, in accordance with other policies of the Plan. SDLs are not extended to accommodate potential development sites or the Plan's site</p>



Core Policy CP3 - Settlement Hierarchy		
	<ul style="list-style-type: none"> • The site is in a prime location for the expansion of the urban edge of the settlement and the site is outside, but adjacent to the Dursley SDL and surrounded by development to the north and west. • Exclusion from the settlement development limit based on the AONB should not be the only consideration in the alteration of the Settlement Development Boundary given that some settlements are located within the AONB. 	<p>allocations because they are yet to be developed and the intention behind SDLs is to define the current extent of existing settlements, marking the transition to countryside.</p> <p>The 2020 SALA (EB22d) identified that the site (DUR024) sits within the Cotswolds AONB in an area deemed to have high sensitivity to housing development. It was considered unsuitable for development, due to potential landscape impacts and visual impacts on heritage assets. SA Appendix 9 (CD3b) sets out the audit trail of site options: the site was promoted at Emerging Strategy stage and again through the Draft Plan consultation; the SA concludes that there are potential impacts preventing sustainable development in this location.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p>
<p>Policy wording modifications: None</p>		



CP4

Core Policy CP4 - Place Making				
Number of representations: 16		Support: 8	Object: 3	Comment: 5
Stakeholders	Comments		Stroud District Council Response	
Support				
Rubhicon Planning Ltd for Tritax Symmetry Gloucester (609)	<ul style="list-style-type: none"> While we do not disagree with the principles of CP4, they do not fit with employment development and do not seem to be written with employment uses in mind. As an example, proposals are expected to integrate into the neighbourhood, support community services and meet employment requirements in terms of mix, tenure and type. 		Core Policy CP4 is applicable to all development proposals. Supporting text explains (2.9.21) that the policy reflects the Council’s commitment to maintaining and enhancing the quality of the built environment throughout the District. It promotes sustainable development to create attractive places in which people wish to live, work and play.	
	<ul style="list-style-type: none"> The Spatial Vision is overly concerned with residential place making and does not account for development characteristics of employment uses. As such, it does not provide an appropriate place-making vision for employment sites. The Vision needs to specifically refer to the economic development of the district, this would then tie into Policy CP4 tailored to specifically refer to Employment development 		Core Policy CP4 is intended to underpin both the Local Plan visions (that is the District-wide Spatial Vision to 2040 and the eight place-specific cluster Mini Visions) and the Strategic Objectives (2.9.21). The District Vision (p19) references “our sustainable and thriving local economy”; it notes particular growth in <i>high tech, green technologies, creative industries and tourism</i> , which are amongst the distinctive “economic qualities” of Stroud District, upon which the Vision draws.	
Policy wording modifications:				
	<p>All development proposals shall accord with the Mini Visions and have regard to the Guiding Principles for that locality, as set out in this Plan, and shall be informed by other relevant documents, such as any design statements adopted as Supplementary Planning Documents. Proposals will be expected to:</p> <ol style="list-style-type: none"> Integrate into the local area: take account of connectivity; be located close to appropriate levels of facilities and services; reduce car dependency; improve transport choice; support local community services and facilities; and meet local employment or housing requirements or in terms of mix, tenure and type local housing requirements; 		All suggested policy wording modifications will be considered by the Inspectors at the EIP.	



Core Policy CP4 - Place Making		
	<p>2. Place shape and protect or enhance a sense of place: create a place with a locally-inspired or distinctive character (whether historic, traditional or contemporary) using appropriate materials, textures, colours and locally distinctive architectural styles; working with the site topography, orientation and landscape features; as well as protecting or enhancing local biodiversity, the historic environment and any heritage assets;</p> <p>3. Create safe streets, <u>or roads</u>, homes and workplaces: where buildings are positioned with landscaping to define and enhance spaces; assist finding your way around with focal points or landmarks; provide permeability, reduce car domination of the residential street and reduce vehicle speeds; provide shared or social spaces on the <u>residential</u> streets (where appropriate); create safe well managed attractive public and private amenity spaces; and provide adequate external storage space for waste bins, recycling materials and bicycle storage.</p>	
<p>McLoughlin Planning for Avant Homes (839)</p>	<ul style="list-style-type: none"> Support the overall objectives of the Place Making policy. However, any reliance on Supplementary Planning Documents or Design Statements will have to be subject to proper scrutiny to ensure that the controls imposed thought those documents meet the requirements of national guidance. 	<p>Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing Supplementary Planning Documents (SPDs). National Planning Practice Guidance (Paragraph: 008 Reference ID: 61-008-20190315) states that SPDs should build upon and provide more detailed advice or guidance on policies in an adopted local plan.</p> <p>The Council’s Statement of Community Involvement, March 2019 / October 2020 (EB2) states that potential SPDs (whether produced by SDC or by other bodies, including parish councils), will be subject to consultation before they can be adopted as SPD; the SCI sets out how Stroud District Council will inform, engage and consult people throughout the process, providing opportunities for objective scrutiny.</p>



Core Policy CP4 - Place Making		
	<ul style="list-style-type: none"> Turning to the master planning and development of sites, the requirements within paragraph 2 of the policy are supported. However, it must be recognised that they are competing influences on the design of sites. 	<p>Core Policy CP4 reflects the Council’s commitment to maintaining and enhancing the quality of the built environment throughout the District. Supporting text (2.9.21-2.9.22) explains that the policy’s purpose is to promote sustainable development to create attractive places in which people wish to live, work and play. The quality of design of buildings and spaces plays a fundamental role in achieving attractive places. The Policy identifies the importance of an integrated design process from inception, where good place-making and sustainable development are considered together.</p> <p>The SDLP as a whole seeks to signpost particular qualities and considerations that may influence the design of individual sites. The broad approach and place-making principles established through Core Policy CP4 are supported through Core Policy CP14 High Quality Sustainable Development and Delivery Policy ES12 Better Design of Places, whilst locality- and site-specific considerations, characteristics and requirements are articulated throughout Chapter 3 Making Places, via the parish cluster Mini Visions, Guiding Principles, settlement summaries and individual site allocation policies.</p>
Policy wording modifications: None		
<p>McLoughlin Planning for SevenHomes (880)</p>	<ul style="list-style-type: none"> Support the overall objectives of the Place Making policy. However, any reliance on Supplementary Planning Documents or Design Statements will have to be subject to proper scrutiny to ensure that the controls imposed thought those documents meet the requirements of national guidance. 	<p>Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing Supplementary Planning Documents (SPDs). National Planning Practice Guidance (Paragraph: 008 Reference ID: 61-008-20190315) states that SPDs should build upon and provide more detailed advice or guidance on policies in an adopted local plan.</p> <p>The Council’s Statement of Community Involvement, March 2019 / October 2020 (EB2) states that potential SPDs (whether produced by SDC or by other bodies, including parish councils), will be subject to consultation before they can be adopted as SPD; the SCI sets out how Stroud District Council will inform, engage and consult people throughout the process, providing opportunities for objective scrutiny.</p>
	<ul style="list-style-type: none"> Turning to the master planning and development of sites, the requirements within paragraph 2 of the 	<p>Core Policy CP4 reflects the Council’s commitment to maintaining and enhancing the quality of the built environment throughout the District.</p>



Core Policy CP4 - Place Making		
	<p>policy are supported. However, it must be recognised that they are competing influences on the design of sites.</p>	<p>Supporting text (2.9.21-2.9.22) explains that the policy's purpose is to promote sustainable development to create attractive places in which people wish to live, work and play. The quality of design of buildings and spaces plays a fundamental role in achieving attractive places. The Policy identifies the importance of an integrated design process from inception, where good place-making and sustainable development are considered together.</p> <p>The SDLP as a whole seeks to signpost particular qualities and considerations that may influence the design of individual sites. The broad approach and place-making principles established through Core Policy CP4 are supported through Core Policy CP14 High Quality Sustainable Development and Delivery Policy ES12 Better Design of Places, whilst locality- and site-specific considerations, characteristics and requirements are articulated throughout Chapter 3 Making Places, via the parish cluster Mini Visions, Guiding Principles, settlement summaries and individual site allocation policies.</p>
Policy wording modifications: None		
Savills (UK) Limited for The Berkeley Estate (878)	<ul style="list-style-type: none"> Support the principle of integrating new development into neighbourhoods, place-shaping and creating safe streets, homes and workplaces, as set out within Core Policy 4. 	Comment noted.
Policy wording modifications: None		
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> Generally supportive of including a place making policy within the plan. It is however now important that it mirrors the recently published National Model Design Guide Code (2021). Minor changes to the plan would achieve consistency with the Code and thus it could align with National Policy. 	<p>Comment noted.</p> <p>Supporting text for Core Policy CP4 (paragraph 2.9.22) states that all new development proposals should take account of the National Design Guide (MHCLG, 2019), of which the subsequent National Model Design Code (2021) is considered a component part (paragraph 6, The National Model Design Code). The model code is not a statement of national policy; however, the government recommends that the advice in this guidance on how to prepare design codes and guides should be followed.</p> <p>The broad approach and place-making principles established through Core Policy CP4 are supported through Core Policy CP14 High Quality Sustainable Development and Delivery Policy ES12 Better Design of Places, both of which</p>



Core Policy CP4 - Place Making		
		reference the use of and adherence to design codes.
	Policy wording modifications: None	
Savills (UK) Limited for Coln Residential (934)	<ul style="list-style-type: none"> Support the principle of integrating new development into neighbourhoods, place-shaping and creating safe streets, homes and workplaces, as set out within Core Policy 4. 	Comment noted.
	Policy wording modifications: None	
Object		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> The policy is not completely sound because it doesn't explicitly recognise the role of high-quality GI in place making. GI is integral to the characteristics of a place and the Covid pandemic has demonstrated the importance of access to natural green space for community resilience and wellbeing. 	CP4 does not directly reference the words "green infrastructure". However, the Council considers that, read as a whole, the SDLP seeks to protect existing open space and requires additional GI and natural green space, where appropriate, acknowledging importance in terms of place-making, health and wellbeing and biodiversity, including through policies CP14, CP8, DHC5, DHC6 and DHC7.
	Policy wording modifications: None	
Comment		
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> Support the overall objectives of the Place Making policy. However, any reliance on Supplementary Planning Documents or Design Statements will have to be subject to proper scrutiny to ensure that the controls imposed thought those documents meet the requirements of national guidance. 	<p>Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing Supplementary Planning Documents (SPDs). National Planning Practice Guidance (Paragraph: 008 Reference ID: 61-008-20190315) states that SPDs should build upon and provide more detailed advice or guidance on policies in an adopted local plan.</p> <p>The Council's Statement of Community Involvement, March 2019 / October 2020 (EB2) states that potential SPDs (whether produced by SDC or by other bodies, including parish councils), will be subject to consultation before they can be adopted as SPD; the SCI sets out how Stroud District Council will inform, engage and consult people throughout the process, providing opportunities for objective scrutiny.</p>
	<ul style="list-style-type: none"> Turning to the master planning and development of sites, the requirements within paragraph 2 of the 	Core Policy CP4 reflects the Council's commitment to maintaining and enhancing the quality of the built environment throughout the District.



Core Policy CP4 - Place Making		
	<p>policy are supported. However, it must be recognised that they are competing influences on the design of sites.</p>	<p>Supporting text (2.9.21-2.9.22) explains that the policy’s purpose is to promote sustainable development to create attractive places in which people wish to live, work and play. The quality of design of buildings and spaces plays a fundamental role in achieving attractive places. The Policy identifies the importance of an integrated design process from inception, where good place-making and sustainable development are considered together.</p> <p>The SDLP as a whole seeks to signpost particular qualities and considerations that may influence the design of individual sites. The broad approach and place-making principles established through Core Policy CP4 are supported through Core Policy CP14 High Quality Sustainable Development and Delivery Policy ES12 Better Design of Places, whilst locality- and site-specific considerations, characteristics and requirements are articulated throughout Chapter 3 Making Places, via the parish cluster Mini Visions, Guiding Principles, settlement summaries and individual site allocation policies.</p>
Policy wording modifications: None		
<p>Avison Young for the Nuclear Decommissioning Authority (872)</p>	<p>Guiding Principles for the Berkeley Cluster:</p> <ul style="list-style-type: none"> All development proposals within the cluster of parishes around Berkeley are expected to accord with the Berkeley Cluster Mini Vision and Guiding Principles. Principles 2 and 3 are of particular note. With respect to Guiding Principle 2 (p164) (relating to the former Berkeley Power Station site / Gloucestershire Science and Technology Park): clearer reference should be made to office, B2 and B8 employment uses, as proposed to be permitted under Delivery Policy EI2a. 	<p>Guiding principle 2 refers to “GREEN” employment uses, relating to the <i>Gloucestershire Renewable Energy, Engineering and Nuclear Skills Centre</i> at the Science and Technology Park. This is consistent with policy EI2a and supporting text 5.27. Whilst the Guiding Principles do not specifically mention general employment uses, this is not in conflict with EI2a. The Guiding Principles pick up on key themes and distinctive qualities for each Parish Cluster; continued general employment uses is not considered to be a key theme or distinctive quality of the Berkeley Cluster.</p>
Policy wording modifications: None		
<p>Falfield Parish Council (884)</p>	<ul style="list-style-type: none"> Falfield parish is located just south of the Stroud District Council border in the adjoining county of South Gloucestershire. Concern over exacerbation of traffic impacts likely to result from proposed developments at Berkeley, 	<p>Core Policy CP4 reflects the Council’s commitment to maintaining and enhancing the quality of the built environment throughout the Stroud District. Supporting text (2.9.21-2.9.22) explains that the policy’s purpose is to promote sustainable development to create attractive places in which people wish to live, work and play. The quality of design of buildings and spaces plays</p>



Core Policy CP4 - Place Making		
	<p>Cam, Dursley, Kingswood, Newtown / Sharpness, Wisloe and Renishaw New Mills, particular in terms of access to M5. We are not aware of or have been asked to be involved in any cross border co-ordination regarding mitigation of additional impact.</p> <ul style="list-style-type: none"> For our existing communities located along the A38 the reverse situation of CP4 Paragraph 3 is likely to occur, unless they are given the same environmental consideration as residents of the new developments i.e. <i>“Create safe streets, homes and workplaces: where buildings are positioned with landscaping to define and enhance streets and spaces.....reduce car domination of the street and reduce vehicle speeds; provide shared or social spaces on the streets”</i>. The environmental needs of existing residents impacted by the developments still needs to be addressed and designed into the plan. 	<p>a fundamental role in achieving attractive places. The Policy identifies the importance of an integrated design process from inception, where good place-making and sustainable development are considered together.</p> <p>The broad approach and place-making principles established through Core Policy CP4 are supported through Core Policy CP14 High Quality Sustainable Development and Delivery Policy ES12 Better Design of Places, whilst locality- and site-specific considerations, characteristics and requirements are articulated throughout Chapter 3 Making Places, via the parish cluster Mini Visions, Guiding Principles, settlement summaries and individual site allocation policies.</p> <p>The SDLP has raised cross boundary matters and been subject to consultation throughout its preparation and the parish council has been formally consulted on the emerging plan. The District Council has been engaging with South Gloucestershire Council throughout this period to ensure that co-ordination across the boundary is achieved and required mitigations measures are put in place. As detailed proposals emerge, the parish council will be subject to further consultation opportunities.</p>
Policy wording modifications: None		
<p>Rapleys LLP for Crest Nicholson Land and Partnerships (897)</p>	<ul style="list-style-type: none"> The policy is not clearly expressed in its intention or consistent with national policy and should be revised to accord with the provisions contained within the National Model Design Code (MHCLG January 2021). To be justified and effective, the policy should draw upon the ten characteristics of well-designed places set out within the Code and which are developed within it. This is an appropriate reference point for place-making policies. 	<p>Supporting text for Core Policy CP4 (paragraph 2.9.21) explains that Core Policy CP4 is intended to underpin both the Local Plan visions (that is the District-wide Spatial Vision to 2040 and the eight place-specific cluster Mini Visions) and the Plan’s Strategic Objectives. The policy is applicable to all development proposals and reflects the Council’s commitment to maintaining and enhancing the quality of the built environment throughout the District. It promotes sustainable development to create attractive places in which people wish to live, work and play.</p> <p>Supporting text for Core Policy CP4 (paragraph 2.9.22) states that all new development proposals should take account of the National Design Guide (MHCLG, 2019), of which the subsequent National Model Design Code (MHCLG, 2021) is considered a component part (paragraph 6, The National Model Design Code). The model code is not a statement of national policy; however, the government recommends that the advice in this guidance on</p>



Core Policy CP4 - Place Making		
		<p>how to prepare design codes and guides should be followed.</p> <p>National Planning Practice Guidance (Paragraph: 008 Reference ID: 61-008-20190315) states that SPDs may be produced, to build upon and provide more detailed advice or guidance on policies in an adopted local plan. The SDLP allows for the creation of supplementary guidance, including design coding where appropriate, to build upon and focus the broad principles set out in CP4.</p>
Policy wording modifications: None		
RPS Group for Redrow homes Ltd (948)	<p>Mini Vision 3.4.2 – Gloucester’s Rural Fringe:</p> <ul style="list-style-type: none"> To reflect the role that the Land to the South of Hardwicke (G1) will have in delivering housing, reference to the site should be made within the mini vision. 	<p>Supporting text for Core Policy CP4 (paragraph 2.9.20-2.9.21) explains that Core Policy CP4 is intended to underpin the Plan’s Mini Visions, which set out the envisaged and desired effects that the development strategy should have on particular parts of the District.</p> <p>Mini Vision 3.4.2 references the envisaged role and desired effect of site G1 in the following terms:</p> <p><i>“Hardwicke’s... village character and sense of community will be conserved and enhanced through a southern expansion, which will provide a local centre and additional community provision, as well as relieving existing rural lanes of through traffic”.</i></p>
Policy wording modifications:		
	<p>Mini Vision 3.4.2 – Gloucester’s Rural Fringe:</p> <ul style="list-style-type: none"> Amend mini vision to make reference to “promoting an inclusive community, capable of providing significant community and infrastructure improvements to benefit both existing and future residents of Hardwicke”. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		

Core Policy CP5 - Environmental development principles for strategic sites				
Number of representations: 20		Support: 6	Object: 3	Comment: 11
Stakeholders	Comments		Stroud District Council Response	
Support				
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> Whilst CFL is generally supportive of environmental design principles, as with CP4, it is important that the SDLP is reviewed in light of the new National Model Design Guide Code (2021). 		Comment noted. It is not considered that the New National Model Design Guide Code requires this policy to be reviewed.	
	<ul style="list-style-type: none"> For the policy to be effective and clear, it should either seek compliance with the National Model Design Guide Code (2021) or set its own standards and dis-apply the national standard. 		Comment noted. It is not considered that the New National Model Design Guide Code requires this policy to be reviewed.	
Policy wording modifications: None				
Rubhicon Planning Ltd for Tritax Symmetry Gloucester Ltd (609)	<ul style="list-style-type: none"> CP5 needs to be clear that in addressing development principles for strategic sites the policy as a whole addresses residential and non-residential sites. The first five bullet points include requiring the provision of community facilities, this is not normally expected on employment sites. The second paragraph refers to applications for strategic sites – both residential and non-residential. The numbered bullet points need to be relevant to employment sites. 		Applications for all strategic sites (both residential and non-residential) will be required to provide a statement demonstrating how sustainable construction principles have been incorporated.	
	Policy wording modifications: <ul style="list-style-type: none"> Strategic sites will: <ol style="list-style-type: none"> 1. Be built at an appropriate density that is acceptable in townscape, local environment, character and amenity terms 2. Be low impact in terms of the environment and the use of resources 3. For residential sites be readily accessible by bus, bicycle and foot to shopping and employment opportunities, key services and community facilities; and will 		All suggested policy wording modifications will be considered by the Inspectors at the EIP.	



Core Policy CP5 - Environmental development principles for strategic sites		
	<p>contribute towards the provision of new sustainable transport infrastructure to serve the area, in seeking to minimise the number and distance of single purpose journeys by private cars</p> <p>4. Have a layout, access, parking, and landscaping in accordance with an approved indicative masterplan</p> <p>5. Be located to achieve a sustainable form of development and/or support regeneration. Development proposals should incorporate a negotiated masterplan.</p>	
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> GWT welcomes the commitment to developments that will deliver high-quality Green Infrastructure to Building with Nature Standards. It should be highlighted that these standards are freely available to follow without a requirement for accreditation, and therefore, do not represent an additional cost that affects viability. GWT also supports the requirement for early engagement and delivery of strategic landscaping, which is vital to achieve the maximum benefits for nature’s recovery and deliver Biodiversity Net Gain effectively. 	Comments noted.
	<ul style="list-style-type: none"> GWT proposes that the requirement to deliver a minimum of 10% Biodiversity Net Gain should be explicit. This should be increased to a minimum of 20% BNG in allocations aiming for garden community status. This will demonstrate that they are going over and above the legal minimum, which is benefiting of the vision they are promoting to communities. 	There is no evidence to suggest an arbitrary increase to 20% is either viable or deliverable. The current policy is based on the Councils evidence base and government requirements.
Policy wording modifications: None		



Core Policy CP5 - Environmental development principles for strategic sites		
Blue Fox Planning Ltd for Persimmon Homes Severn Valley (928)	<ul style="list-style-type: none"> Support the Policy with suggested wording changes, to address concerns regarding feasibility and viability. 	Comment noted. The supporting text to Policy CP5 states in para. 2.9.26 "It is acknowledged that pursuing sustainable development requires careful attention to the viability and costs; nevertheless, this policy provides a positive framework of key environmental principles."
	Policy wording modifications: <ul style="list-style-type: none"> "Applications for all strategic sites (both residential and non-residential) will be required to provide a statement demonstrating how sustainable construction principles have been incorporated. This should address demolition, construction and long term management. This will be expected to show how the proposal maximises its contribution, subject to technical feasibility and viability considerations, towards the following objectives:...." 	
Object		
No comments received	Policy wording modifications: None	
Comment		
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> This policy sets out a series of criteria against which proposals will be assessed. As part of the removal of the strategic/local level allocations, the requirements of this policy are encompassed within a series of other policies in the Plan. 	The Council considers this policy to be complimentary and work alongside other policies.
Policy wording modifications: None		
Pegasus Group for Robert Hitchins Ltd (879)	<ul style="list-style-type: none"> For reasons set out elsewhere in our representations, it is considered that the allocation of land at Sharpness for development would not constitute sustainable land use planning, would not be readily accessible by bus and would not be located where there are, or will, be sufficient choices in the mode of transport available, to effectively minimise the number and distance of single purpose journeys by private cars. 	Objections to the allocation at Sharpness are dealt with in the relevant response sections elsewhere in this document in detail.
Policy wording modifications: None		



Core Policy CP5 - Environmental development principles for strategic sites		
Savills for L&Q Estates (913)	<ul style="list-style-type: none"> Bullet 4 – is the intention of the wording to require a separate approval process for an indicative masterplan? Given the allocating policies each require Development Briefs, and indeed, given the requirement for these strategic sites to come forward in a timely manner, the inclusion of another stage in the pre-planning process is not considered necessary as conducive to the timely delivery housing. 	The Council considers that the indicative masterplan approach will ensure that development addresses the site allocation policy requirements for high quality sustainable development in this location in an integrated and co-ordinated manner.
	<ul style="list-style-type: none"> Sustainable Construction Principles – as drafted these do not provide a basis upon any future planning application would be considered, and a judgement made in regard to whether a development sufficiently maximises its contribution to these objectives. 	Comment noted.
Policy wording modifications: None		
Falfield Parish Council (884)	<ul style="list-style-type: none"> No comments 	Noted.
	Policy wording modifications: None	
RCA Regeneration Ltd for Land Development and Estates Ltd (861)	<ul style="list-style-type: none"> The strategic site principles are far too nebulous and there is a missed opportunity to set precise expectations. 	As no ‘precise expectations’ have been suggested as modifications for the Council or Inspector to consider, the Council is unable to consider changes to the wording.
	Policy wording modifications: None	
RCA Regeneration Ltd for Piper Homes (877)	<ul style="list-style-type: none"> The strategic site principles are far too nebulous and there is a missed opportunity to set precise expectations. 	As no ‘precise expectations’ have been suggested as modifications for the Council or Inspector to consider, the Council is unable to consider changes to the wording.
	Policy wording modifications: None	
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> There is a need to ensure that these standards do not apply to smaller development sites. 	The Policy sets out it will apply to strategic sites.
	Policy wording modifications: None	



Core Policy CP5 - Environmental development principles for strategic sites		
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> There is a need to ensure that these standards do not apply to smaller development sites. 	The Policy sets out it will apply to strategic sites.
Policy wording modifications: None		
Black Box Planning for Taylor Wimpey UK Limited (936)	<ul style="list-style-type: none"> The policy is too vague and open to a varied interpretation. This may result in the policy being ineffective in practice and it duplicates other development management policies in the local plan which provide more specific targets. A similar issue arises in respect of criteria A to H in policy CP5. Without an understanding of standards expected is it impossible for this policy to be accurately factored in viability considerations. 	As no modifications for the Council or Inspector to consider have been submitted, the Council is unable to consider changes to the wording.
Policy wording modifications: None		
Rapleys LLP for Crest Nicholson Land and Partnerships (897)	<ul style="list-style-type: none"> The policy should require future proposals to demonstrate accordance with either the locally adopted code or the national model. 	Comment noted.
Policy wording modifications: None		
Rubicon Planning Ltd (616)	<ul style="list-style-type: none"> Junction 12 of the M5 should be identified as a strategic growth and development location. 	Comment noted.
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		

Core Policy CP6 - Infrastructure and developer contributions				
Number of representations: 21		Support: 4	Object: 3	Comment: 14
Stakeholders	Comments		Stroud District Council Response	
Support				
Savills (UK) Limited for Coln Residential (934)	<ul style="list-style-type: none"> The provision of strategic and local sites across the District needs to be evolved alongside the emerging local plan to ensure that what is required by policy is realistic, having particular regard to viability, the infrastructure requirements/costs and how they are to be funded. 		Support noted. Viability assessment should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.	
Policy wording modifications: None				
Avison Young for St Modwen Developments & Tortworth Estate (883)	<ul style="list-style-type: none"> It is apparent that a “substantial” upgrade of J14 and improvements to the surrounding road network are required to enable to the delivery of the proposed allocation in the above locations and that possible funding sources are not evidenced. 		Highway mitigation in the form of a new junction at Junction 14 has been tested as part of the transport model. The Council has committed to producing a Funding and Delivery Strategy for transport improvements. This will be published in due course.	
	<ul style="list-style-type: none"> IDP should inform the preparation of an Infrastructure Funding Statement, this has not been provided by the Council. 		Ahead of the EIP, the Council is updating its Infrastructure Delivery Plan evidence base and documentation. This will be published in due course.	
	<ul style="list-style-type: none"> IDP states that collaborative working will be required between Stroud DC, South Gloucestershire, Highways England and other stakeholders to resolve the capacity issues, however it does not go further to set out any potential funding streams and timescales that might help deliver the required highways infrastructure within the plan period. Developers can’t pay millions of pounds. 		Highway mitigation in the form of a new junction at Junction 14 has been tested as part of the transport model. The Council has committed to producing a Funding and Delivery Strategy for transport improvements. This will be published in due course.	
	<ul style="list-style-type: none"> LPR Evidence Base documents related to infrastructure delivery do not go far enough to demonstrate that the necessary highways interventions would be delivered during the plan period. 		The Council has committed to producing a Funding and Delivery Strategy for transport improvements. This will be published in due course.	
Policy wording modifications: None				

Core Policy CP6 - Infrastructure and developer contributions		
Object		
Lichfields for CEG & Charfield Landowners Consortium (923)	<ul style="list-style-type: none"> It is crucial that Stroud District Council and South Gloucestershire Council work together to ensure that the necessary transport infrastructure, including Junction 14 of the M5, is designed, funded and delivered to unlock the development potential of south Stroud and north South Gloucestershire. To achieve this, effective transport modelling must be undertaken as part of the evidence base to support the draft policies. 	Highway mitigation in the form of a new junction at Junction 14 has been tested as part of the transport model. The Council has committed to producing a Funding and Delivery Strategy for transport improvements in partnership with National Highways, South Gloucestershire Council and Gloucestershire County Council. This will be published in due course.
	<ul style="list-style-type: none"> CEG's consultant Evoke has undertaken extensive modelling work on the junction and the options for improvement (further detail is provided within the Transport Assessments submitted as part of planning application Reference: P19/2452/O). This has confirmed that the cost of the proposed Junction 14 improvement works is anticipated to be c.£50m. This is therefore a significant issue that requires detailed consideration in the draft plan. 	Highway mitigation in the form of a new junction at Junction 14 has been tested as part of the transport model. The Council has committed to producing a Funding and Delivery Strategy for transport improvements in partnership with National Highways, South Gloucestershire Council and Gloucestershire County Council. This will be published in due course.
	<ul style="list-style-type: none"> The impact of strategic growth on M5 J14 must be tested taking into account cumulative growth in neighbouring local authority areas (e.g. Charfield) with appropriate contributions secured for a strategic highways solution. This must be an integral requirement of the draft policy. 	Highway mitigation in the form of a new junction at Junction 14 has been tested as part of the transport model. The Council has committed to producing a Funding and Delivery Strategy for transport improvements in partnership with National Highways, South Gloucestershire Council and Gloucestershire County Council. This will be published in due course.
	<ul style="list-style-type: none"> Policy CP6 is not considered sound. Without considering in further detail the cumulative impact of development on the highway network and the specific infrastructure to deliver those sites, this policy will not achieve sustainable development. 	The Council has committed to producing a Funding and Delivery Strategy for transport improvements in partnership with National Highways, South Gloucestershire Council and Gloucestershire County Council. This will be published in due course.
Policy wording modifications: None		



Core Policy CP6 - Infrastructure and developer contributions		
Comment		
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> CP6 should identify delivery timetables for the required infrastructure. 	CP6 is a high level core policy of the Plan. The expected delivery of housing growth is set out within the SDLP on page 306. Necessary scheduling of infrastructure requirements will be set out within the IDP (EB69) with appropriate references within the site allocation policies themselves.
	<ul style="list-style-type: none"> The IDP notes that levels of congestion on the motorway could constrain economic growth in Stroud, and by association adversely affect the deliverability of the Local Plan. 	Comment noted.
	<ul style="list-style-type: none"> There is no indication within the IDP Main Report as to the likely cost of the mitigation scheme at Jn.12, or in respect of other pinch-point areas within the Gloucester Fringe that will require infrastructure improvements to the road network. 	The Traffic Forecasting Report (EB61) sets out indicative costs for the highway mitigation schemes set out in the IDP (EB69). Ahead of the EIP, the Council is updating its Infrastructure Delivery Plan evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> The policy should be drafted to ensure that contributions sought relate to the marginal impact that each development will have on the operation of the highway network; accordingly existing capacity should be assigned to existing commitments rather than treating all the proposed allocations listed above in the same way. 	The SDLP is a full review of the adopted Local Plan. The Hunts Grove Extension has yet to receive planning permission and therefore it is appropriate to review the allocation in the same way as the consideration of new allocations.
	<ul style="list-style-type: none"> Should explain in the supporting text how the Council will actively seek public as well as private funding from central government to support the delivery of housing and economic development in alignment with the eSDLP delivery trajectory 	The Council has committed to producing a Funding and Delivery Strategy for transport improvements in partnership with National Highways, South Gloucestershire Council and Gloucestershire County Council. This will be published in due course.
	<ul style="list-style-type: none"> Reference to in-kind contributions is noted in the list of likely sources of funding for infrastructure, but this cannot be relied upon, nor can it form part of any future planning application balancing exercise where the contribution fails CIL Regulation test 122(2). To 	In-kind contributions are not inconsistent with national legislation.



Core Policy CP6 - Infrastructure and developer contributions		
	avoid the plan being inconsistent with national legislation it is suggested that criterion (i) is removed from CP6.	
	Policy wording modifications:	
	<ul style="list-style-type: none"> Reference to in-kind contributions is noted in the list of likely sources of funding for infrastructure, but this cannot be relied upon, nor can it form part of any future planning application balancing exercise where the contribution fails CIL Regulation test 122(2). To avoid the plan being inconsistent with national legislation it is suggested that criterion (i) is removed from CP6. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Savills (UK) Limited for The Berkeley Estate (878)	<ul style="list-style-type: none"> Support the commitment for SDC to ensure infrastructure will be in place at the right time. We encourage SDC to work with the development sector as part of delivering key infrastructure. 	Comment noted. Ahead of the EIP, the Council is updating its Infrastructure Delivery Plan evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> The provision of strategic and local sites across the District needs to be evolved alongside the emerging local plan to ensure that what is required by policy is realistic, having particular regard to viability, the infrastructure requirements/costs and how they are to be funded. 	Support noted. Viability assessment should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
	Policy wording modifications: None	
Rapeys LLP for Crest Nicholson Land and Partnerships (897)	<ul style="list-style-type: none"> It is critical that the Council ensures that the infrastructure improvements required to deliver the overall strategy are identified clearly and are timetabled. 	Comment noted. Ahead of the EIP, the Council is updating its Infrastructure Delivery Plan evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> The Infrastructure Delivery Plan (IDP) should identify the infrastructure, funding and delivery mechanisms that are needed to support the Local Plan and make clear that public funding will be sought alongside any S106 contributions from the planned allocations. 	<p>Comment noted. Ahead of the EIP, the Council is updating its Infrastructure Delivery Plan evidence base and documentation. This will be published in due course.</p> <p>The SDLP is a full review of the adopted Local Plan. The Hunts Grove Extension has yet to receive planning permission and therefore it is appropriate to</p>



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	<p>However, in this regard it will also be important to distinguish between existing commitments that are being delivered and are already allocated and schemes proposed for allocation through the review of the Local Plan.</p>	review the allocation in the same way as the consideration of new allocations.
	<ul style="list-style-type: none"> PS30 allocation (SA4) was subject to such consideration during the previous examination process. In this regard existing commitments should benefit from any residual spare capacity that is available within the junction before pro-rata contributions are sought towards any improvement scheme. 	The SDLP is a full review of the adopted Local Plan. The Hunts Grove Extension has yet to receive planning permission and therefore it is appropriate to review the allocation in the same way as the consideration of new allocations.
	<ul style="list-style-type: none"> The policy should be drafted to ensure that contributions sought relate to the marginal impact that each development will have on the operation of the highway network; accordingly, existing capacity should be assigned to existing commitments rather than treating all the proposed allocations listed above in the same way. 	The SDLP is a full review of the adopted Local Plan. The Hunts Grove Extension has yet to receive planning permission and therefore it is appropriate to review the allocation in the same way as the consideration of new allocations.
Policy wording modifications: None		
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> No Infrastructure Funding Statement provided, therefore not clear what s106 is expected Unlike the strategic sites, the local development sites have not been viability tested. The exact infrastructure requirements for allocation PS44 have yet to be fully tested through the planning process. However, the Infrastructure requirements in the IDP set out the following costs: <ul style="list-style-type: none"> Pre-School £135,819 Primary School £185,619 Secondary School £138,522 Post 16 £76,204 	<p>Comment noted. Ahead of the EIP, the Council is updating its Infrastructure Delivery Plan evidence base and documentation. This will be published in due course.</p> <p>The Council's Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled a set of development sites that are broadly representative of the local allocation sites which are expected to come forward under the new Local Plan. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p>



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	<ul style="list-style-type: none"> Healthcare £43,798 (noted IDP considers seeking space on PS44 for medical centre at page 78) Sports Facilities (AGP/Halls/Swimming Pool) £27,366 Community Centre £17,052 Libraries £9,094 This equates to a S106 package of £633,474 (£21,115 per unit) as a minimum and excludes public open space typologies and any contributions to off-site highways infrastructure (A38/B4071 junction) or the Perry Way (improvements budgeted at £135,000 in total). This is a significant cost per unit and without viability testing, there is the concern that such a level of contributions may not be viable, when the wider policy requirements are considered, especially when an allocation of only 30 dwellings is proposed. 	
Policy wording modifications: None		
Avison Young for Redrow Homes Limited (945)	<ul style="list-style-type: none"> not set out the contributions expected from development, including strategic sites, or the levels and types of infrastructure required. In the absence of clear policy requirements, it will be difficult to determine the viability of sites. We also consider that the emerging Local Plan remains ambiguous on what requirements fall under the Community Infrastructure Levy (CIL) versus s106 agreements. IDP doesn't provide reliable evidence base for education contributions 	<p>The Council's Viability Assessment (EB70) sets out the contributions expected from development, including strategic sites. Ahead of the EIP, the Council is updating its infrastructure and viability evidence base and documentation. This will be published in due course.</p> <p>The Council's Duty to Cooperate Statement (EB3) notes that Gloucestershire County Council's approach towards calculating the education needs arising from development was challenged successfully by developers in June 2021 (Appeal Ref: APP/G1630/W/20/3257625 Land off the A38, Coombe Hill, Gloucestershire). Due to uncertainty in this area at the time of preparing the Pre-Submission Local Plan, the District Council's Infrastructure Delivery Plan and Viability Assessment have included a range of potential contribution</p>



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		requirements. Stroud District Council is committed to working with Gloucestershire County Council and developers to attempt to resolve matters during the examination process.
	<ul style="list-style-type: none"> SDC have been unable to take a stance on education contributions at this point, having awaited the Coombe Hill appeal decision. This remains one of the outstanding points preventing the application from being determined to date and demonstrates the impact of an evidence base that is not sound or clear. In this manner, we consider that that the plan is ineffective in delivering sustainable development. 	Stroud District Council is committed to working with Gloucestershire County Council and developers to attempt to resolve matters during the examination process. Ahead of the EIP, the Council is updating its infrastructure and viability evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> SDC’s most recent charging schedule (February 2017) outlines an expectation that Early Years, Primary and Secondary School infrastructure schemes should be funded, or part funded through CIL. Annex 2 ‘Indicative Draft Regulation 123 List’ goes on to outline that generally, only new primary schools at strategic site allocations would be expected to be funded through S.106 obligations. In contrast, throughout the application process for ref. S.20/0100/FUL, County have sought contributions to education through S.106 agreements and continue to do so despite the development proposals not meeting the scale/criterion suggested in SDC’s charging schedule. We therefore consider there has been an inconsistent approach to how education contributions are sought in the District. 	The District Council’s position on this is quite clear and is set out in the annual Infrastructure Funding Statements. The County Council has decided to take a different approach. The District Council is committed to working with Gloucestershire County Council and developers to attempt to resolve matters during the examination process.
	Policy wording modifications: None	
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> The concern with the IDP is that it sets out multiple infrastructure requirements and is a document which will be “reviewed and updated as circumstances change” (para 2.9.30). The challenge with this document being outside of the planning process is 	Policy CP6 refers explicitly to the preparation and review of the IDP, which will set out the infrastructure to be provided by partners. This is an approach set out within the current adopted Local Plan, considered a sound approach in 2015. The NPPF provides for applicants to challenge requirements which do not meet the CIL tests (see para. 57) and states that “It is up to the applicant



Core Policy CP6 - Infrastructure and developer contributions		
	that it could lead to infrastructure requirements being demanded from development which do not meet the tests set out above or make development unviable.	to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.” (para. 58).
	<ul style="list-style-type: none"> Developer contributions cannot be used to seek contributions to address existing deficiencies infrastructure, but rather only be required to address the impacts arising from the development itself. 	Comment noted. The NPPF provides for applicants to challenge requirements which do not meet the CIL tests (see para. 57).
Policy wording modifications: None		
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> The concern with the IDP is that it sets out multiple infrastructure requirements and is a document which will be “reviewed and updated as circumstances change” (para 2.9.30). The challenge with this document being outside of the planning process is that it could lead to infrastructure requirements being demanded from development which do not meet the tests set out above or make development unviable. 	Policy CP6 refers explicitly to the preparation and review of the IDP, which will set out the infrastructure to be provided by partners. This is an approach set out within the current adopted Local Plan, considered a sound approach in 2015. The NPPF provides for applicants to challenge requirements which do not meet the CIL tests (see para. 57) and states that “It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.” (para. 58).
	<ul style="list-style-type: none"> Developer contributions cannot be used to seek contributions to address existing deficiencies infrastructure, but rather only be required to address the impacts arising from the development itself. 	Comment noted. The NPPF provides for applicants to challenge requirements which do not meet the CIL tests (see para. 57).
Policy wording modifications: None		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> More detail is needed to determine if the plan demonstrates a duty to cooperate compliance in respect to strategic alignment of developer contributions for biodiversity and GI with other local authorities. 	Comment noted. The Council’s Duty to Cooperate Statement (EB3) sets out (in Section 5) the work undertaken to align biodiversity policies across Gloucestershire and with South Gloucestershire, and includes Statements of Common Ground with Gloucestershire, South Gloucestershire and Natural England relating to biodiversity.
Policy wording modifications: None		
Pegasus Group for Robert Hitchins Ltd (879)	<ul style="list-style-type: none"> Pre-Submission Plan suggests that the IDP will be reviewed and updated as circumstances change. This infers that the levels of infrastructure identified by the IDP and presumably sought by the emerging Local 	Policy CP6 refers explicitly to the preparation and review of the IDP, which will set out the infrastructure to be provided by partners. This is an approach set out within the current adopted Local Plan, considered a sound approach in 2015. The level of infrastructure required is always reviewed at the planning



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	Plan could change without these being subject to examination. Such changes could lead to the deliverability of the emerging Local Plan being undermined contrary to paragraph 34 of the NPPF.	application stage, which is not subject to examination but can be subject to appeal. The NPPF provides for applicants to challenge requirements which do not meet the CIL tests (see para. 57) and states that “It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.” (para. 58).
	<ul style="list-style-type: none"> The element that remains unclear is the cost of highways/transport infrastructure. The IDP is not transparent in respect of what is required for each of the strategic sites. 	The Traffic Forecasting Report (EB61) sets out indicative costs for the highway mitigation schemes set out in the IDP (EB69). Ahead of the EIP, the Council is updating its Infrastructure Delivery Plan evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> The IDP is fundamentally flawed at least insofar as educational infrastructure is concerned. Indeed, it is based on evidence prepared by the LEA which is not consistent with national policy or guidance and is not justified in accordance with the findings of the recent Coombe Hill appeal decision 	Due to uncertainty in this area at the time of preparing the Pre-Submission Local Plan, the District Council’s Infrastructure Delivery Plan and Viability Assessment have included a range of potential contribution requirements. Stroud District Council is committed to working with Gloucestershire County Council and developers to attempt to resolve matters during the examination process.
	<ul style="list-style-type: none"> CP6 as drafted does not accord with national guidance in several respects because: <ol style="list-style-type: none"> The infrastructure policy requirements are not clear contrary to the PPG Planning Obligations Paragraph: 004 Reference ID: 23b-004-20190901. They cannot therefore be accurately accounted for in the price paid for land contrary to the PPG Planning Obligations Paragraph: 004 Reference ID: 23b-004-20190901. The potential updates to the IDP, which would presumably be applied when determining planning applications, could introduce a new formulaic approach such as a new pupil product ratio in an evidence base document without this having been subject to examination contrary to the PPG Planning 	<p>Comment noted. Ahead of the EIP, the Council is updating its Infrastructure Delivery Plan evidence base and documentation. This will be published in due course.</p> <p>The infrastructure policy requirements are clearly set out in the SDLP (subject to IDP update).</p> <p>The infrastructure requirements can be accurately accounted for (subject to IDP update).</p> <p>The PPG reference to introducing new formulaic approach is in the context of supplementary planning documents, which is not the case in this instance.</p>



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	<p>Obligations Paragraph: 004 Reference ID: 23b-004-20190901.</p> <p>4. The emerging Local Plan does not set out the contributions expected from development for infrastructure to support the delivery of the strategic sites contrary to PPG Planning Obligations Paragraph: 005 Reference ID: 23b-005-20190315, although this is set out in the IDP.</p> <p>5. The emerging Local Plan does not set out the contributions expected from development towards educational infrastructure including pupil yields contrary to paragraph 34 of the NPPF and the PPG Planning Obligations Paragraph: 007 Reference ID: 23b-007-20190315.</p> <p>6. The emerging Local Plan does not set out policies for contributions expected such that these can be fairly and openly tested at examination contrary to the PPG Planning Obligations Paragraph: 013 Reference ID: 23b-013-20190315.</p>	<p>PPG Planning Obligations Paragraph: 005 Reference ID: 23b-005-20190315 says that Plans should be informed by evidence of infrastructure and affordable housing. The SDLP has been informed by evidence of infrastructure and affordable housing need.</p> <p>PPG Planning Obligations Paragraph: 007 Reference ID: 23b-007-20190315 states that “Plan makers and local authorities for education should therefore agree the most appropriate developer funding mechanisms for education, assessing the extent to which developments should be required to mitigate their direct impacts.” The District Council has agreed with the County Council the on-site education requirements for strategic sites and these are reflected in the SDLP. However, due to the successful challenge of Gloucestershire County Council’s approach towards calculating education contributions (Appeal Ref: APP/G1630/W/20/3257625 Land off the A38, Coombe Hill, Gloucestershire) at the time of preparing the Pre-Submission Local Plan, the District Council’s Infrastructure Delivery Plan and Viability Assessment have included a range of potential contribution requirements. Stroud District Council is committed to working with Gloucestershire County Council and developers to attempt to resolve matters during the examination process.</p> <p>The SDLP does set out policies for contributions and the detailed information contained within the IDP and viability assessments (subject to planned updates) will be available to enable fair and open testing at examination.</p>
	<ul style="list-style-type: none"> The Infrastructure Funding Statement of the District Council should provide this detail and for example identify that developers will contribute to educational infrastructure through CIL receipts on 	<p>The Council’s annual Infrastructure Funding Statement does set out the Council’s current approach to funding infrastructure through CIL and S106. The SDLP does set out policies for contributions and the detailed information contained within the IDP and viability assessments (subject to planned</p>



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	<p>non-strategic sites and through s106 contributions on strategic sites. This must be clearly set out in Core Policy CP6 to accord with paragraph 34 of the NPPF and the various of the PPG referred to above in order to provide clarity to applicants.</p>	<p>updates) will be available to enable fair and open testing at examination.</p>
	<ul style="list-style-type: none"> The IDP suggests at the start of page 47 that the previous forecasts of the LEA have underestimated the need historically. This is simply incorrect. Previous forecasts have consistently significantly overestimated the number of pupils arising as accepted by the LEA at the recent Coombe Hill appeal and acknowledged in the appeal decision. 	<p>The reference in the IDP (page 47) is a factual reference to the County Council's Schools Places Strategy which states that the forecasts have appeared to underestimate the need historically. Due to the successful challenge of Gloucestershire County Council's approach towards calculating education contributions at Coombe Hill, at the time of preparing the Pre-Submission Local Plan, the District Council's Infrastructure Delivery Plan and Viability Assessment have included a range of potential contribution requirements. Stroud District Council is committed to working with Gloucestershire County Council and developers to attempt to resolve matters during the examination process.</p>
	<ul style="list-style-type: none"> The IDP forecasts the educational needs for individual clusters on pages 54 to 59. This approach does not accord with the PPG Planning Obligations Paragraph: 008 Reference ID: 23b-008-20190315 which requires that plan-makers consider the capacity across relevant school place planning areas rather than the clusters identified in the emerging Local Plan. 	<p>It is recognised that the specific relationship between the parish clusters and the school place planning areas requires clarification. The IDP does recommend that further work should be undertaken to establish a clearer picture on actual requirements for strategic sites, taking account of existing school capacities and the overall school population expected by 2040.</p>
	<ul style="list-style-type: none"> The Evidence in the IDP provided by the LEA is not accurate and is not reliable. (Full rep goes into a high level of detail and must be read in full, not possible to summarise or recreate here in a useful way) 	<p>Stroud District Council is committed to working with Gloucestershire County Council and developers to attempt to resolve matters during the examination process. Ahead of the EIP, the Council is updating its infrastructure and viability evidence base and documentation. This will be published in due course.</p>
Policy wording modifications: None		
RPS Group for Redrow Homes Ltd (948)	<ul style="list-style-type: none"> No Infrastructure Funding Statement (IFS) has been prepared 	<p>The Council produces an annual Infrastructure Funding Statement in accordance with Government requirements. However, it is agreed that the IDP needs updating to inform the identification of infrastructure required and the level of contributions required. Ahead of the EIP, the Council is updating its infrastructure and viability evidence base and documentation. This will be</p>

Core Policy CP6 - Infrastructure and developer contributions	
	published in due course.
<ul style="list-style-type: none"> Pre-Submission Plan suggests that the IDP will be reviewed and updated as circumstances change. This infers that the levels of infrastructure identified by the IDP and presumably sought by the emerging Local Plan could change without these being subject to examination, relevant policies reviewed accordingly. Such changes could lead to the deliverability of the emerging Local Plan being undermined contrary to paragraph 34 of the NPPF. 	<p>Policy CP6 refers explicitly to the preparation and review of the IDP, which will set out the infrastructure to be provided by partners. This is an approach set out within the current adopted Local Plan, considered a sound approach in 2015. The level of infrastructure required is always reviewed at the planning application stage, which is not subject to examination but can be subject to appeal. The NPPF provides for applicants to challenge requirements which do not meet the CIL tests (see para. 57) and states that “It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.” (para. 58).</p>
<ul style="list-style-type: none"> As currently prepared, there is no indication of the infrastructure requirements for the strategic sites and consequently it is not clear what the policy requirements are so that this can be taken into account in assessing the viability of the sites. 	<p>The IDP (EB69) sets out by infrastructure type the site requirements for all strategic sites. The Viability Assessment (EB70) takes infrastructure costs for the strategic sites from the IDP and undertakes a high level viability appraisal of the strategic sites and a broad range of site types to take account of other development. Ahead of the EIP, the Council is updating its infrastructure and viability evidence base and documentation. This will be published in due course.</p>
<ul style="list-style-type: none"> Policy CP6 as drafted does not therefore accord with national guidance in several respects because: <ol style="list-style-type: none"> The infrastructure policy requirements are not clear contrary to the PPG Planning Obligations Paragraph: 004 Reference ID: 23b-004-20190901 They cannot therefore be accurately accounted for in the price paid for land contrary to the PPG Planning Obligations Paragraph: 004 Reference ID: 23b-004-20190901 The potential updates to the IDP, which would presumably be applied when determining planning applications, could introduce a new formulaic approach such as a new pupil product ratio in an evidence base document without this having been subject to examination contrary to the PPG Planning Obligations Paragraph: 004 Reference ID: 23b-004- 	<p>Comment noted. Ahead of the EIP, the Council is updating its Infrastructure Delivery Plan evidence base and documentation. This will be published in due course.</p> <p>The infrastructure policy requirements are clearly set out in the SDLP (subject to IDP update). The infrastructure requirements can be accurately accounted for (subject to IDP update).</p> <p>The PPG reference to introducing new formulaic approach is in the context to supplementary planning documents, which is not the case in this instance.</p> <p>PPG Planning Obligations Paragraph: 005 Reference ID: 23b-005-20190315 says that Plans should be informed by evidence of infrastructure and affordable housing. The SDLP has been informed by evidence of infrastructure and affordable housing need.</p> <p>PPG Planning Obligations Paragraph: 007 Reference ID: 23b-007-20190315 states that “Plan makers and local authorities for education should therefore</p>



Core Policy CP6 - Infrastructure and developer contributions		
	<p>20190901</p> <p>4. The emerging Local Plan does not set out the contributions expected from development for infrastructure to support the delivery of the strategic sites PPG Planning Obligations Paragraph: 005 Reference ID: 23b-005-20190315</p> <p>5. The emerging Local Plan does not set out the contributions expected from development for towards educational infrastructure including pupil yields contrary to the PPG Planning Obligations Paragraph: 007 Reference ID: 23b-007-20190315</p> <p>6. The emerging Local Plan does not set out policies for contributions expected such that these can be fairly and openly tested at examination contrary to the PPG Planning Obligations Paragraph: 013 Reference ID: 23b-013-20190315.</p>	<p>agree the most appropriate developer funding mechanisms for education, assessing the extent to which developments should be required to mitigate their direct impacts.” The</p> <p>District Council has agreed with the County Council the on-site education requirements for strategic sites and these are reflected in the SDLP. However, due to the successful challenge of Gloucestershire County Council’s approach towards calculating education contributions (Appeal Ref: APP/G1630/W/20/3257625 Land off the A38, Coombe Hill, Gloucestershire) at the time of preparing the Pre-Submission Local Plan, the District Council’s Infrastructure Delivery Plan and Viability Assessment have included a range of potential contribution requirements. Stroud District Council is committed to working with Gloucestershire County Council and developers to attempt to resolve matters during the examination process.</p> <p>The SDLP does set out policies for contributions and the detailed information contained within the IDP and viability assessments (subject to planned updates) will be available to enable fair and open testing at examination.</p>
Policy wording modifications: None		
<p>Black Box Planning for Taylor Wimpey UK Limited (936)</p>	<ul style="list-style-type: none"> Wish to highlight inconsistencies with the IDP and the policy wording for the G2 site (Land at Whaddon). For example, in respect of education requirements for Land at Whaddon, the IDP is not consistent with the G2 policy wording, and furthermore not consistent with an updated position of the education authority regarding school place planning and provision 	<p>The District Council has agreed with the County Council the on-site education requirements for strategic sites and these are reflected in the SDLP. However, due to the successful challenge of Gloucestershire County Council’s approach towards calculating education contributions (Appeal Ref: APP/G1630/W/20/3257625 Land off the A38, Coombe Hill, Gloucestershire) at the time of preparing the Pre-Submission Local Plan, the District Council’s Infrastructure Delivery Plan and Viability Assessment have included a range of potential contribution requirements. Stroud District Council is committed to working with Gloucestershire County Council and developers to attempt to resolve matters during the examination process.</p>
	<ul style="list-style-type: none"> Policy CP6 should make it clear that CIL is not chargeable on the allocated strategic sites. 	<p>The Council’s annual Infrastructure Funding Statement does set out the Council’s current approach to funding infrastructure through CIL and S106. However, CIL needs to be reviewed once the Local Plan has been adopted.</p>



Core Policy CP6 - Infrastructure and developer contributions		
	<ul style="list-style-type: none"> Support the final paragraph of policy CP6 to enable viability considerations and site specific circumstances to be factored into the assessment of infrastructure provision and appropriate developer contributions. 	Support noted.
Policy wording modifications: None		
Highways England (873)	<ul style="list-style-type: none"> It is requested that the need for the necessary infrastructure is set out in both individual allocation policies where necessary and an over-arching infrastructure policy, to provide assurance that the authority is committed to bringing the necessary infrastructure forward in line with the proposed growth aspirations. 	The Duty to Cooperate Statement (EB3) sets out a Statement of Common Ground with National Highways whereby Stroud District Council acknowledges the need for the SDLP to set out clearly the necessary infrastructure required and provide a policy basis to secure it. The parties agree to work together through the examination process to resolve the outstanding matters raised by National Highways by agreeing appropriate modifications to the Plan where necessary.
Policy wording modifications: None		
Falfield Parish Council (884)	<ul style="list-style-type: none"> Disappointed that the possibility of creating another M5 junction nearer the new communities is not explored in the plan. Given the current overly long distance between M5 Junctions 13 and 14, the fact that junction M5 14 is already operating beyond capacity and the regularly frequency that this part of the M5 motorway needs to be closed due to accidents or maintenance requiring motorway traffic to divert onto the A38 this would make sense. 	The potential for a new motorway junction midway between junctions 13 and 14 was explored early in the plan-making process. However, neither National Highways, nor Gloucestershire County Council have plans for this project.
	<ul style="list-style-type: none"> New transport interchanges and additional rail stations at Stonehouse and Sharpness are welcomed, but there needs to be a delivery timetable agreed now. 	Support noted. The delivery of the proposed strategic allocation sites will need to be integrated with the required infrastructure. Ahead of the EIP, the Council is updating its infrastructure and viability evidence base and documentation. This will be published in due course.
Policy wording modifications: None		
Home Builders Federation (HBF) (892)	<ul style="list-style-type: none"> It is inappropriate for the Council to expect developers to make up existing deficiencies in existing infrastructure and amenities. The Council should only be seeking contributions to meet requirements originating from new development. 	Agreed. However, Policy CP6 does not require a developer to make up an existing deficiency. It only requires a development to provide additional infrastructure where it would exacerbate an existing deficiency in their provision.



Core Policy CP6 - Infrastructure and developer contributions		
	<ul style="list-style-type: none"> One significant concern is the exclusion of abnormal costs for greenfield sites and Strategic Sites and a minimal allowance of 5% of base build costs for brownfield sites. The approach is contradictory to reality and inappropriate basis for plan wide viability testing. The Council’s approach implies that all abnormal costs should be fully deducted from the assumed Benchmark Land Value (BLV). 	<p>The Council’s Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment makes clear that an additional allowance is made for abnormal costs associated with brownfield sites of 5% of the BCIS costs. Abnormal costs will be reflected in land value. Those sites that are less expensive to develop will command a premium price over and above those that have exceptional or abnormal costs.</p>
	<ul style="list-style-type: none"> Another significant concern is the approach to the provision of educational infrastructure. The Council’s final viability assessment appraisals assume that the education requirements of the County Council are included in Community Infrastructure Levy (CIL) for non-strategic site typologies. However, the HBF are aware that Gloucestershire County Council are routinely requesting additional payments of up to £17,000 per dwelling. It is also unclear if these costs are included in the modelling assumptions for the Strategic Sites. 	<p>The District Council’s position on this is quite clear and is set out in the annual Infrastructure Funding Statements. The County Council has decided to take a different approach. The District Council is committed to working with Gloucestershire County Council and developers to attempt to resolve matters during the examination process.</p>
	<ul style="list-style-type: none"> The Council’s viability assessment confirms that a large proportion of typologies including Strategic Sites will be unable to bear the Council’s full policy aspirations. Most sites should be deliverable at planning application stage without further viability assessment negotiations. Viability negotiations should occur occasionally rather than routinely. The Council’s overall policy requirements should be revisited and reduced (Core Policies CP6, CP8, CP9, DCP1 & DCP2 and Delivery Policies HC3, DES3, EI12, ES1, ES6 & ES16). Without revision in many cases, trade-offs between policy requirements, affordable housing and infrastructure provision will be necessary and the 	<p>The Council’s Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. A large proportion of greenfield sites are viable and promoters of committed brownfield sites and strategic sites have confirmed their deliverability. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p>



Core Policy CP6 - Infrastructure and developer contributions		
	Council will have to accept site specific viability assessments at development management stage.	
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
214	<ul style="list-style-type: none"> Sites should not be prejudiced in viability terms by excessive conditions and contributions. 	Support noted. Viability assessment should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
Policy wording modifications: None		

Core Policy CP7 - Inclusive communities				
Number of representations: 12		Support: 4	Object: 5	Comment: 3
Stakeholders	Comments		Stroud District Council Response	
Support				
Savills (UK) Limited for The Berkeley Estate (878)	<ul style="list-style-type: none"> Support the general policy principles. 		Support noted	
	Policy wording modifications: None			
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> Support the delivery of housing for a range of people. 		Support noted	
	<ul style="list-style-type: none"> support the application of the M4(2) accessibility standards which is becoming an industry standard. 		Support noted for Policy DCH2.	
	<ul style="list-style-type: none"> M4(3) standards should only be required for dwellings over which the Council has housing nomination rights. 		This is a comment more relevant to Policy CP8. The policy and supporting text reflect the recommendations of the Local Housing Needs Assessment (EB10) that 8% of all housing should meet M4(3) Category 3 requirements (adaptable for market, adapted for affordable housing).	
	<ul style="list-style-type: none"> Impact of enhanced accessibility standards on viability of: <ul style="list-style-type: none"> Individual housing schemes Whole plan viability not addressed in viability report. 		The Council's Viability Assessment (May 2021) (EB70) has modelled the cost of M4(2) and M4(3) dwellings when assessing overall viability, taking into account costs set out in the Housing Standards Review, suitably indexed. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.	
Policy wording modifications: None				
Savills (UK) Limited for Coln Residential (934)	<ul style="list-style-type: none"> Support the general policy principles. 		Support noted.	
	Policy wording modifications: None			
Object				
The Planning Bureau Ltd for McCarthy and Stone Retirement Lifestyles Ltd (675)	<ul style="list-style-type: none"> Commend commitment towards meeting the need of all sections of the community and encouraging social cohesion. 		Support noted.	
	<ul style="list-style-type: none"> Specialist older person's housing benefits: <ul style="list-style-type: none"> Supportive community Social cohesion Reduced isolation Active role in a community Frees up under occupied family housing 		Comment noted.	



Core Policy CP7 - Inclusive communities		
	<ul style="list-style-type: none"> Concerned how a typical sheltered housing scheme would be able to address all the diverse needs in the policy. 	Policy CP7 makes clear that the requirements relate to the type of long term need that the development relates to. So, a sheltered scheme would not be expected to take into account the needs, for example, of children or young people.
	<ul style="list-style-type: none"> Recommend an increasing the policy threshold to apply to larger developments of over 50 units. 	Major development is a term and definition used consistently throughout the SDLP to refer to a development of a size where the wider needs of the community should be taken into consideration. There is no clear justification for a different threshold of 50.
Policy wording modifications:		
	<ul style="list-style-type: none"> Increase the threshold detailed in Paragraph 4.4. in the supporting text for Policy CP7 from 10 dwellings or more to 50 units. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Chilmark Consulting for Charterhouse Strategic Land (865)	<ul style="list-style-type: none"> Support the overall intention to ensure that new housing development contributes to the provision of sustainable and inclusive communities to encourage social cohesion. <ul style="list-style-type: none"> Requires development to demonstrate how it will contribute to meeting identified long term needs in the communities the development relates to. 	Support noted
	<ul style="list-style-type: none"> The Plan and evidence base do not establish the housing needs (in terms of tenure, size or mix / choice) of individual settlements, Parish Clusters or communities. 	The Council’s Role and Function of Settlements studies (EB71 and EB72), together with Census and other freely available data at local level (for example Gloucestershire County Council parish profiles), and local housing needs surveys produced by parishes, provide the evidence to enable developers to build up a profile of local areas. Policy CP7 is not prescriptive about the use of data to justify proposals.
	<ul style="list-style-type: none"> The Plan and evidence base do not establish the long term economic, social or community needs of individual settlements, Parish Clusters or communities that need to be addressed. 	The Council’s Role and Function of Settlements studies, together with Census and other freely available data at local level (for example Gloucestershire County Council parish profiles), and local housing needs surveys produced by parishes, provide the evidence to enable developers to build up a profile of local areas. Policy CP7 is not prescriptive about the use of data to justify proposals.
	<ul style="list-style-type: none"> Financial contributions to a Community Development 	Comments noted. Ahead of the EIP, the Council is updating its viability



Core Policy CP7 - Inclusive communities		
	<p>Officer need to be:</p> <ul style="list-style-type: none"> ○ Viability tested ○ Necessary to make the development acceptable in planning terms ○ Directly related to the development ○ Fairly and reasonably related in scale and kind to the development. 	evidence base and documentation. This will be published in due course.
	Policy wording modifications:	
	<ul style="list-style-type: none"> ● The Policy and its supporting text should make specific reference to where information can be found to support the implementation of the policy and requirement for financial contributions to a Community Development 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Pegasus Group for Robert Hitchins Ltd (879)	<ul style="list-style-type: none"> ● Policy requirements are not clearly defined: <ul style="list-style-type: none"> ○ Unclear what housing developments will be specifically required to provide. ○ Wording more akin to a strategic objective 	The NPPF states that the needs of groups with specific housing requirements should be addressed (para. 60) and Core Policy CP7 provides further clarification on the types of needs that major development should seek to address. Subsequent policies provide further detail relating to the specific needs of different groups.
	<ul style="list-style-type: none"> ● Unclear how policy requirements will be measured with regard to: <ul style="list-style-type: none"> ○ ‘health and wellbeing service co-ordination’ ○ Need for development proposals to take into account the ‘needs’ of children, young people and families ○ Relationship to LHNA findings ○ Potential repetition of DCP2 	Core Policy CP7 provides a high level clarification on the types of needs that major development should seek to address. Paragraph 4.11 explains the relationship between health and wellbeing service coordination and housing. Other policies provide further detail. For example Policy DCP2 relates to accommodation for older people and Policy CP8 states that new developments must take account of the District's housing needs, as set out in the Local Housing Needs Assessment.
	<ul style="list-style-type: none"> ● Concerns regarding viability assessment: <ul style="list-style-type: none"> ○ Cumulative impact of indistinctly described policy requirements ○ Provision of or financial contributions towards a Community Development Support Officer in relation to statutory tests. 	The viability assessment has set out the policies likely to have a direct impact on viability, in terms of specific asks. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
	Policy wording modifications: None	



Core Policy CP7 - Inclusive communities		
Comment		
RCA Regeneration Ltd for Land Development and Estates Ltd (861)	<ul style="list-style-type: none"> A specific and measurable set of aims should be provided, which could be implemented particularly on larger sites: <ul style="list-style-type: none"> Eg. a minimum provision of, perhaps 10% for older people and/or lifetime homes. Housing for older people covered by policy DCP2. Policy requirements too vague in relation to other groups 	The NPPF states that the needs of groups with specific housing requirements should be addressed (para. 60) and Core Policy CP7 provides further clarification on the types of needs that major development should seek to address. Subsequent policies provide further detail relating to the specific needs of different groups.
	<ul style="list-style-type: none"> Support a presumption in favour of developments which meet the needs of the groups identified. 	Support noted
	<ul style="list-style-type: none"> Highlight Adult social care providers - no direct allocations for this use and have to retrofit existing buildings as a result. 	Comment noted
	Policy wording modifications: None	
RCA Regeneration Ltd for Piper Homes (877)	<ul style="list-style-type: none"> A specific and measurable set of aims should be provided, which could be implemented particularly on larger sites: <ul style="list-style-type: none"> Eg. a minimum provision of, perhaps 10% for older people and/or lifetime homes. Housing for older people covered by policy DCP2. Policy requirements too vague in relation to other groups 	The NPPF states that the needs of groups with specific housing requirements should be addressed (para. 60) and Core Policy CP7 provides further clarification on the types of needs that major development should seek to address. Subsequent policies provide further detail relating to the specific needs of different groups.
	<ul style="list-style-type: none"> Support a presumption in favour of developments which meet the needs of the groups identified. 	Support noted.
	<ul style="list-style-type: none"> Highlight Adult social care providers - no direct allocations for this use and have to retrofit existing buildings as a result. 	Comment noted.
	Policy wording modifications: None	
Savills for L&Q Estates (913)	<ul style="list-style-type: none"> The policy should set out the housing needs of respective groups. 	The NPPF states that the needs of groups with specific housing requirements should be addressed (para. 60) and Core Policy CP7 provides further



Core Policy CP7 - Inclusive communities		
		clarification on the types of needs that major development should seek to address. Subsequent policies provide further detail relating to the specific needs of different groups.
	<ul style="list-style-type: none"> • Separate policy requirement for Health Impact Assessment to address wider design and placemaking considerations. 	One of the policies which provides further detail is Delivery Policy DHC5.
	<ul style="list-style-type: none"> • The reference to s106 contributions for a Community Development Officer is not supported. <ul style="list-style-type: none"> ○ No clarity on role and responsibilities. ○ No justification for why this contribution would make development acceptable. 	The purpose and role of community development officers is set out clearly in para. 4.5. As with travel planning, establishing patterns of future behaviour and creating social networks as developments are being implemented is a fundamental part of placemaking.
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
423	<ul style="list-style-type: none"> • New footpath needed between the Prince of Wales and Taites Hill, and between Berkeley and the garage on the A38. • Footpath along the A38 between the Prince of Wales and the garage needs to be restored and extended to Newport. 	Comments noted. Policy CP8 requires the layout of new housing developments to be accessible and access to new developments may require improvements to the current network to make them accessible.
Policy wording modifications: None		



Core Policy DCP2 - Supporting Older People and People with Mobility Issues				
Number of representations: 11		Support: 5	Object: 2	Comment: 4
Stakeholders	Comments		Stroud District Council Response	
Support				
Tetlow King Planning for South West Housing Association Planning Consortium (HAPC) (885)	<ul style="list-style-type: none"> Agree that new housing development should be of a high quality in terms of its design and resilience, and provide adequate space to achieve good living standards 		Support noted	
	<ul style="list-style-type: none"> Support policy direction in response to growing need for properties which comply with Part M(2) or Part M(3) of the current Building Regulations as highlighted in the Gloucestershire LHNA 2019 . 		Support noted	
	<ul style="list-style-type: none"> Support clear definition of policy requirements. 		Support noted	
	Policy wording modifications: None			
Savills (UK) Limited for Coln Residential (934)	<ul style="list-style-type: none"> Support the principle of providing a bespoke policy to address the needs of older people and people with mobility issues in the District. 		Support noted	
	<ul style="list-style-type: none"> Support the delivery of provision in accessible locations. 		Support noted	
	Policy wording modifications: None			
Object				
The Planning Bureau Ltd for McCarthy and Stone Retirement Lifestyles Ltd (675)	<ul style="list-style-type: none"> Consider the relatively low level of Extra Care provision surprising: <ul style="list-style-type: none"> Lies at the forefront of policy and thinking towards meeting the housing and care needs of an older population. Provides housing and care. Alternative to care home accommodation. Growing option for older people. 		The policy requirements are evidence based as set out in the Gloucestershire Local Housing Needs Assessment (September 2020) (EB10) (LHNA). Based on the current need and growth in population aged 75+ identified, the LHNA identified the potential requirement for new specialist housing for the period 2021-2041 using prevalence rates for sheltered housing from the Housing LIN SHOP resource pack and rates for extra care from Gloucestershire County Council.	
	<ul style="list-style-type: none"> The M4(2) and M4(3) requirement for specialist housing has been set higher than that for conventional housing with impacts on: <ul style="list-style-type: none"> Floor areas, 		The policy requirements are evidence based as set out in the Gloucestershire Local Housing Needs Assessment (September 2020) (EB10) (LHNA). As most of the identified growth in households with wheelchair users are aged 75 or over, it is likely that many of these households would also be identified as	

Core Policy DCP2 - Supporting Older People and People with Mobility Issues		
	<ul style="list-style-type: none"> ○ Building efficiency, ○ Reduction in units, ○ Viability 	needing specialist housing for older persons. The Council's Viability Assessment (May 2021) (EB70) has considered the impacts of these standards on types of accommodation. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> ● Ignores beneficial facilities already available as part of specialised housing for older people eg communal wheelchair storage. 	The policy requirements are evidence based as set out in the Gloucestershire Local Housing Needs Assessment (September 2020) (EB10) and based on specific nationally recognised standards. Adapting existing properties or relying on non-standard beneficial design solutions will not be enough to provide sufficient properties to meet the needs of a growing older population.
	<ul style="list-style-type: none"> ● The LHNA recommendation for 25% provision of M4(3) is also largely based on assumption. <ul style="list-style-type: none"> ○ Impractical for private units with no identified end user. 	Whilst not all households needing wheelchair adapted housing will live in specialist older person housing, the evidence suggests that at any point in time it is likely that around a quarter of those living in specialist housing will need wheelchair adapted homes. It is not unreasonable to expect a private provider to take account of this likely demand.
	<ul style="list-style-type: none"> ● Positive policy approach undermined by inconsistencies in the viability assessment older persons' housing typologies in the Stroud District Council Local Plan Viability Assessment (LPVA). See CP9 and supporting evidence. 	The Council's Viability Assessment (May 2021) (EB70) has considered the impacts of these standards on types of accommodation. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> ● Reference should be made only to the overall need for specialised housing for older people and should not be split between sheltered and extra care. 	The NPPF makes clear that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.
	<ul style="list-style-type: none"> ● The M4(3) requirement should be amended to reflect the overall calculated need for such housing throughout all planned development 	The M4(3) requirement is set out clearly by types of housing, reflecting the differing needs, as identified in the Gloucestershire Local Housing Needs Assessment (September 2020) (EB10) (LHNA).
	Policy wording modifications: None	
Comment		
Pegasus Group for Robert Hitchins Ltd (879)	<ul style="list-style-type: none"> ● Remodelled policy requirement that 'major developments will be expected to provide' two bedroom homes including bungalows that are desirable to older people' has not been viability tested. 	It is reasonable to expect major housing developments to provide for the size, type and tenure of housing needed for different groups in the community. The LHNA (EB10) sets out a proportion of sizes and types of accommodation needed to meet general demographic and specific needs. Policy CP8 requires developers to take account of the needs set out in the LHNA, but, in the



Core Policy DCP2 - Supporting Older People and People with Mobility Issues		
	<ul style="list-style-type: none"> ○ Level of required provision of two bedroom homes including bungalows unclear. 	interests of flexibility and reflecting site specific factors, the SDLP is not prescriptive. It is not proportionate to test every potential mix of house types for viability, particularly as there is no specific numerical requirement.
	<ul style="list-style-type: none"> ● Concerns regarding LHNA evidence for: <ul style="list-style-type: none"> ○ Local housing need for 2 bedroom homes including bungalows policy requirement ○ Net need for two-bedroom housing or bungalows for older people ○ claims that ‘a quarter of older households nationally would move to another home if there was suitable housing available that met their aspirations in the right place’ (paragraph 9.53 & 9.70) ○ No net need assessment of older person general needs housing 	Whilst individual assumptions in the LHNA (EB10) may be challenged, the SDLP does not include specific requirements for the number of 2 bedroom homes including bungalows to be provided. As such, the SDLP is not prescriptive, but in requiring developers to have regard to the findings of the LHNA, simply reflects the concerns of the NPPF that development should reflect the size, type and tenure of housing needed.
	<ul style="list-style-type: none"> ● Viability assessment of enhanced accessibility standards: <ul style="list-style-type: none"> ○ fails to reflect the impact of larger floor area and specification requirements on land take, masterplanning and overall viability. ○ Underestimation of costs. ○ Fails to demonstrate viability of enhanced policy requirements. 	The Council’s Viability Assessment (May 2021) (EB70) has modelled the cost of M4(2) and M4(3) dwellings when assessing overall viability, taking into account costs set out in the Housing Standards Review, suitably indexed. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> ● Policy fails to make the distinction between national requirements for the provision of wheelchair accessible and wheelchair adaptable homes: <ul style="list-style-type: none"> ○ Local Plan policies for wheelchair accessible homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. 	The policy and supporting text reflect the recommendations of the Local Housing Needs Assessment (EB10) that 8% of all housing should meet M4(3) Category 3 requirements (adaptable for market, adapted for affordable housing).
	<ul style="list-style-type: none"> ● The LHNA does not provide enough information to 	There are inevitable uncertainties around the extent to which the existing



Core Policy DCP2 - Supporting Older People and People with Mobility Issues		
	ascertain the proportion of additional new build homes that would need to be built to wheelchair standards after taking into account supply from existing stock through potential adaptations.	stock is capable of accommodating potential adaptations but the LHNA (EB10) sets out reasonable assumptions based on available evidence e.g. the English Housing Survey.
	<ul style="list-style-type: none"> Policy requirements for enhanced accessibility provision are not proven as a net requirement after the scope for adaptations to existing housing stock has been taken into account; <ul style="list-style-type: none"> Potential overestimation of requirements. 	There are inevitable uncertainties around the extent to which the existing stock is capable of accommodating potential adaptations but the LHNA (EB10) sets out reasonable assumptions based on available evidence e.g. the English Housing Survey.
Policy wording modifications:		
	<ul style="list-style-type: none"> “There is an overall modelled demand of 3,091 older person homes for the Plan period, split between 2,811 sheltered housing and 280 extra care. The development of specialist older person housing will be supported within both the owner occupied and rented sectors in accessible locations. Major housing developments will be expected to provide for a range of house types, including two bedroom dwellings and bungalows, which many older people find desirable and suitable to live in as they age and which will release larger properties which will then be available to families. Initiatives and developments will also be supported which: <ol style="list-style-type: none"> 1. Enable older people to live independently in their own home; 2. Increase the range of available housing options with care and support services in accessible locations; 3. Promote active lifestyles; 4. Increase older people’s engagement in community life, including through “hubs”. To support an ageing population and the specific needs of people with mobility problems, 67% of both 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.



Core Policy DCP2 - Supporting Older People and People with Mobility Issues		
	<p>market and affordable homes market homes should be accessible and adaptable by meeting requirement M4(2) Category 2 of the Building Regulations and 8% of both market and affordable homes should be to M4(3) Category 3 of the Building Regulations. At least 25% of specialist housing for older people should meet M4(3) Category 3 requirements and all specialist housing for older people should meet M4(2) Category 2 requirements.”</p>	
Home Builders Federation (HBF) (892)	<ul style="list-style-type: none"> • If the Council wishes to adopt the optional standards for accessible & adaptable dwellings, then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46) and the NPPG and justified by credible and robust evidence. 	The policy incorporates the optional standards referred to in the NPPF para.130 and footnote 49 on the basis that there is demonstrable local need, as set out in the Gloucestershire Local Housing Needs Assessment (September 2020) (EB10) (LHNA).
	<ul style="list-style-type: none"> • Concerns regarding LHNA evidence for: <ul style="list-style-type: none"> ○ Local circumstances demonstrating additional need for accessible and adaptable homes. ○ Number of households likely to move into new M4(2) standards homes. ○ Number of under-occupied houses likely to be vacated and available for families. ○ Policy requirements for proportion of general needs housing required to meet enhanced accessibility standards. 	The Council believes that the evidence set out in the LHNA (EB10) relating to the justification of M4(2) and M4(3) standards is credible and robust.
	<ul style="list-style-type: none"> • Concerns regarding Viability Assessment of additional costs: <ul style="list-style-type: none"> ○ Stated costs below alternative estimates. ○ Not sufficiently viability tested 	The Council’s Viability Assessment (May 2021) (EB70) has modelled the cost of M4(2) and M4(3) dwellings when assessing overall viability, taking into account costs set out in the Housing Standards Review, suitably indexed. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> • Should be amended to clarify that where step-free access is not viable, neither of the Optional Requirements in Part M should be applied. 	The supporting text at 4.13 makes clear that “The Council will take account of site-specific factors in applying the requirement and where the requirement would render the development unviable.”
	<ul style="list-style-type: none"> • Should distinguish between wheelchair accessible 	The policy and supporting text reflect the recommendations of the Local



Core Policy DCP2 - Supporting Older People and People with Mobility Issues		
	<p>dwelling, which include the most common features required by wheelchair users (M4(3b)) and wheelchair adaptable dwelling, which include features to make a home easy to convert to be fully wheelchair accessible (M4(3a)).</p>	<p>Housing Needs Assessment (EB10) that 8% of all housing should meet M4(3) Category 3 requirements (adaptable for market, adapted for affordable housing).</p>
	<ul style="list-style-type: none"> The requirement for M4(3) should only be required for dwellings over which the Council has housing nomination rights. 	<p>The policy and supporting text reflect the recommendations of the Local Housing Needs Assessment (EB10) that 8% of all housing should meet M4(3) Category 3 requirements (adaptable for market, adapted for affordable housing).</p>
<p>Policy wording modifications: None</p>		
Savills for L&Q Estates (913)	<ul style="list-style-type: none"> Support the principle that developments should meet a range of housing needs, including housing for older people. 	<p>Support noted.</p>
	<ul style="list-style-type: none"> The requirement for 67% of housing at Part M4(2) and 8% at Part M4(3) does not appear to be supported by the evidence base in terms of need, nor the viability evidence supporting the plan. <ul style="list-style-type: none"> The LHNA indicates that there is a need for 8,848 dwellings for combined Part M4(2) and (3) – Figure 78. This appears to relate to those households which will have a health problem which will affect their housing need by to 2051 – 10 years beyond the plan period. It is not appropriate for current developers to be required to meet a future need beyond the plan period. 	<p>The M4(2) standard requires “the changing needs of occupants over time” to be considered. It is therefore appropriate to take into consideration the needs of households in 2040/1 who are likely to develop health problems within 10 years.</p>
	<ul style="list-style-type: none"> Baseline figure unclear for calculating future need for enhanced standards and future need for enhanced standards may be overestimated. 	<p>The Council believes that the evidence set out in the LHNA (EB10) relating to the justification of M4(2) and M4(3) standards is credible and robust.</p>
	<ul style="list-style-type: none"> Figures given in the LHNA are described as covering both Part M4(2) and (3). Policy requirement for 67% and 8% - combined at 75%; would represent a 	<p>The recommendation of the LHNA (EB10) is that the evidence supports the need for a target of 75% (combined) of all housing, and preferably more to take account of the lack of provision in the existing housing stock. The figure</p>



Core Policy DCP2 - Supporting Older People and People with Mobility Issues		
	requirement above the LHNA's calculation of need, notwithstanding that this appears inflated.	for Stroud is 75%, which is slightly more than the 73% using the needs identified in LHNA Figure 5 and the housing requirement of 12,600 (which uses a different methodology) but in line with the LHNA recommendations.
Policy wording modifications: None		
RPS Group for Stroud Corporation NV (917)	<ul style="list-style-type: none"> Welcome policy approach for supporting developments which increase the range of available housing options with care and support services in accessible locations. 	Support noted.
	<ul style="list-style-type: none"> Recommends that homes for older people, including sheltered, enhanced sheltered, extra care, registered care provision should be recognised as a form of housing in the housing strategy. 	Comments noted. The Council's Housing Strategy 2019-2024 includes older people's housing within the section "Support for residents".
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
423	<ul style="list-style-type: none"> Some current footpaths alongside roads will need to be widened and properly maintained so that they are compatible with motorised wheel chair use. 	The comment is noted. Policy CP8 requires the layout of new housing developments to be accessible and this will include wheel chair needs and access to new developments may require improvements to the current network to make them accessible.
423	<ul style="list-style-type: none"> Parking of cars on the pavement will need to be discouraged. 	The comment is noted. Policy EI12 requires developers to justify car parking levels on new developments taking into account the accessibility needs of residents.
Policy wording modifications: None		



Core Policy CP8 - New housing development				
Number of representations: 11		Support: 4	Object: 1	Comment: 6
Stakeholders	Comments		Stroud District Council Response	
Support				
Sport England (133)	<ul style="list-style-type: none"> Encourage the adoption of Sport England's Active Design guidance as a base line for new housing developments. 		Supported noted. Whilst Sport England's Active Design guidance is a source of good practice, Policy CP8 does not seek to prescribe particular standards, or best practice which may evolve over time. However, the policy does set out principles which reflect the NPPF and good practice.	
Policy wording modifications: None				
Savills (UK) Limited for The Berkeley Estate (878)	<ul style="list-style-type: none"> Support the general policy principles of Core Policy CP8. 		Support noted	
Policy wording modifications: None				
Savills (UK) Limited for Coln Residential (934)	<ul style="list-style-type: none"> Support the general policy principles of Core Policy CP8. 		Support noted	
Policy wording modifications: None				
Object				
Chilmark Consulting for Charterhouse Strategic Land (865)	<ul style="list-style-type: none"> The Plan and supporting LHNA evidence do not establish the housing needs (in terms of types, tenures or sizes of dwellings) for specific Parish Cluster areas. <ul style="list-style-type: none"> The LHNA does not provide sub-District housing needs analysis. 		Data set out within the Local Housing Need Assessment (EB10) is provided mainly at District level, but the consultants did undertake analysis at sub-District level and this information will be made available.	
Policy wording modifications:				
	<ul style="list-style-type: none"> Policy CP8 should set out precisely what the local housing needs for Parish Cluster areas are. 		All suggested policy wording modifications will be considered by the Inspectors at the EIP.	
Comment				
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> Concern for how quickly an LHNA can age and cease to be relevant. 		LHNAs and local plans are subject to regular review to ensure needs and policies remain relevant.	
	<ul style="list-style-type: none"> Market signals also relevant to determining housing mix, in accordance with NPPF. 		Comment noted. NPPF requirements are a material consideration.	
	<ul style="list-style-type: none"> The policy should be reworded to allow proposals to 'broadly reflect' the housing mix in the LHNA, to 		For major development, the policy uses the word "reflect" which aligns with the NPPF " <i>Within this context, the size, type and tenure of housing needed for</i>	



Core Policy CP8 - New housing development		
	provide additional flexibility and allow the use of market data to ensure viability.	<i>different groups in the community should be assessed and reflected in planning policies” (para. 62)</i>
	<ul style="list-style-type: none"> Policy criteria 1 – 5 are unnecessary and covered in other policies. 	Specific examples of duplication are not provided to test the assertion. It is also not clear how this is a soundness matter.
	Policy wording modifications:	
	<ul style="list-style-type: none"> New housing development must be well designed to address local housing needs, incorporating a range of different types, tenures and sizes of housing, to create mixed communities. New developments must take account of the District's housing needs, as set out in the Local Housing Needs Assessment. In particular, on major sites, the expectation will be that the range of types, tenures and sizes should <i>broadly</i> reflect the housing needs identified for that Parish Cluster area. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> Concern for how quickly an LHNA can age and cease to be relevant. 	LHNAs and local plans are subject to regular review to ensure needs and policies remain relevant.
	<ul style="list-style-type: none"> Market signals also relevant to determining housing mix, in accordance with NPPF. 	Comment noted. NPPF requirements are a material consideration.
	<ul style="list-style-type: none"> The policy should be reworded to allow proposals to ‘broadly reflect’ the housing mix in the LHNA, to provide additional flexibility and allow the use of market data to ensure viability. 	For major development, the policy uses the word “reflect” which aligns with the NPPF <i>“Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies” (para. 62)</i>
	<ul style="list-style-type: none"> Policy criteria 1 – 5 are unnecessary and duplicate other policies. 	Specific examples of duplication are not provided to test the assertion. It is also not clear how this is a soundness matter.
	Policy wording modifications:	
	<ul style="list-style-type: none"> New housing development must be well designed to address local housing needs, incorporating a range of different types, tenures and sizes of housing, to create mixed communities. New developments must take account of the District's housing needs, as set out in the Local Housing Needs Assessment. In particular, on major sites, the expectation will be that 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.



Core Policy CP8 - New housing development		
	the range of types, tenures and sizes should <i>broadly</i> reflect the housing needs identified for that Parish Cluster area.	
RCA Regeneration Ltd for Land Development and Estates Ltd (861)	<ul style="list-style-type: none"> Concerned about implementation of Criteria 4 & 5: <ul style="list-style-type: none"> Suggest a statement that development that meets these criteria will be more favourably considered than those which do not. 	These are key requirements of the Local Plan and summarise detailed policy requirements set out in other policies (e.g. CP14, ES1, DES3).
	<ul style="list-style-type: none"> Unclear how the policy relates to the Biodiversity Net Gain agenda: <ul style="list-style-type: none"> Should signpost any further policies. 	The SDLP includes other policies relating to biodiversity. The plan needs to be read as a whole, rather than include complex cross referencing.
	Policy wording modifications: None	
RCA Regeneration Ltd for Piper Homes (877)	<ul style="list-style-type: none"> Concerned about implementation of Criteria 4 & 5: <ul style="list-style-type: none"> Suggest a statement that development that meets these criteria will be more favourably considered than those which do not. 	These are key requirements of the Local Plan and summarise detailed policy requirements set out in other policies (e.g. CP14, ES1, DES3).
	<ul style="list-style-type: none"> Unclear how the policy relates to the Biodiversity Net Gain agenda: <ul style="list-style-type: none"> Should signpost any further policies. 	CP8 does not directly address biodiversity net gain requirements. Delivery Policy HC1 does seek to address this matter.
	Policy wording modifications: None	
Pegasus Group for Robert Hitchins Ltd (879)	<ul style="list-style-type: none"> Concerned that the policy requires major developments to reflect both District and Parish Cluster housing needs. <ul style="list-style-type: none"> May differ Unclear which would take priority 	Policy CP8 is very clear that all development must <u>take account</u> of District needs and major developments should <u>reflect</u> the needs of parish cluster areas. There is no lack of clarity about what would take priority.
	<ul style="list-style-type: none"> Meeting Parish Cluster housing needs may not be appropriate on larger schemes reflecting a broader housing requirement relating to the District or even a wider housing market area. 	It is not clear from the representation the circumstances in which parish cluster housing needs may not be appropriate. If a specific case can be justified, then the overarching requirement for all development to have regard to the District's needs will still apply.
	<ul style="list-style-type: none"> LHNA does not provide an assessment of housing need at Parish Cluster level. <ul style="list-style-type: none"> Limited NDP coverage does not provide an assessment of housing need across the whole of the Parish Cluster areas. 	Data set out within the Local Housing Need Assessment (EB10) is provided mainly at District level, but the consultants did undertake analysis at sub-District level and this information will be made available.



Core Policy CP8 - New housing development		
	<ul style="list-style-type: none"> Viability Assessment does not reflect the application of housing requirements at the Parish Cluster level or assess viability at a sub-area level based on the extent of the Parish Cluster areas. 	The Council’s Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. As a result, it does assess viability based on the general housing mix set out in the LHNA but also gives consideration to the type and likely setting of the typologies. The representative range of typologies does take into account sub area residential market data, but this does not neatly sub divide into the separate parish cluster areas.
	<ul style="list-style-type: none"> Bullet point 4 remains unchanged from the adopted Local Plan and should be removed in accordance with Government guidelines for energy performance requirements to be set through Building Regulations. 	There is nothing in bullet point 4 which contradicts Government policy. Indeed, it reflects the Government’s vision for the planning system to support the transition to a low carbon future (see NPPF, para. 152).
	Policy wording modifications:	
	<ul style="list-style-type: none"> The Second sentence in paragraph 1 of Core Policy CP8 should be amended as follows: New developments must take account of the District's housing needs, as set out in the Local Housing Needs Assessment in conjunction with other up to date local housing needs assessments and evidence. In particular, on major sites, the expectation will be that the range of types, tenures and sizes should reflect the housing needs identified for that Parish Cluster area. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
	<ul style="list-style-type: none"> Bullet point four should be deleted from Core Policy CP8. 	
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> Concern for how quickly an LHNA can age and cease to be relevant. 	LHNAs and local plans are subject to regular review to ensure needs and policies remain relevant.
	<ul style="list-style-type: none"> Market signals also relevant to determining housing mix, in accordance with NPPF. 	Comment noted. NPPF requirements are a material consideration.
	<ul style="list-style-type: none"> The policy should be reworded to allow proposals to ‘broadly reflect’ the housing mix in the LHNA, to provide additional flexibility and allow the use of market data to ensure viability. 	For major development, the policy uses the word “reflect” which aligns with the NPPF “Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies” (para. 62)
	<ul style="list-style-type: none"> Policy criteria 1 – 5 are unnecessary and duplicate 	Specific examples of duplication are not provided to test the assertion. It is



Core Policy CP8 - New housing development		
	other policies.	also not clear how this is a soundness matter.
	Policy wording modifications:	
	<ul style="list-style-type: none"> New housing development must be well designed to address local housing needs, incorporating a range of different types, tenures and sizes of housing, to create mixed communities. New developments must take account of the District's housing needs, as set out in the Local Housing Needs Assessment. In particular, on major sites, the expectation will be that the range of types, tenures and sizes should <i>broadly</i> reflect the housing needs identified for that Parish Cluster area. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		



Core Policy CP9 - Affordable housing		
Number of representations: 38	Support: 4	Object: 15
Stakeholders	Comments	Stroud District Council Response
Support		
Savills (UK) Limited for The Berkeley Estate (878)	<ul style="list-style-type: none"> Supports the principle of new residential development delivering an appropriate proportion of affordable housing within the scheme subject to viability. 	Support noted.
Policy wording modifications: None		
Savills (UK) Limited for Coln Residential (934)	<ul style="list-style-type: none"> Supports the principle of new residential development delivering an appropriate proportion of affordable housing within the scheme subject to viability. 	Support noted.
Policy wording modifications: None		
Tetlow King Planning for South West Housing Association Planning Consortium (885)	<ul style="list-style-type: none"> Support the Council in setting a 30% affordable housing threshold on sites of four or more dwellings in the AONB or Designated Rural Areas where this is achievable, and viable. Acknowledge that the Council may not be able to meet all affordable housing needs but a housing requirement above the minimum LHN will make a greater contribution to delivering more affordable housing. 	Support noted.
Policy wording modifications: None		
Black Box Planning for Taylor Wimpey UK Limited (936)	<ul style="list-style-type: none"> Support for Policy CP9 on all sites promoted 	Support noted.
Policy wording modifications: None		
Object		
Livedin Custom Build (407)	<ul style="list-style-type: none"> Smaller custom and self-build sites where the affordable provision is less than c.5 units is almost impossible to find RSL's who are willing to take the units on. For these cases we propose that the policy would be more effective if it included a definition of a specific class of affordable housing suitable for smaller 	The Council's experience is that Local RPs can and do take on very small numbers of units.



	<p>CSB sites; the affordable plot. The affordable plots should be provided at zero value to the end user, but with a covenant added to the deeds restricting any future sale of a built dwelling to 70% of full market value.</p>	
<p>Policy wording modifications: None</p>		
<p>Chilmark Consulting for Charterhouse Strategic Land (865)</p>	<ul style="list-style-type: none"> Justified - It is not clear whether viability evidence referred to in the Plan has led to any adjustment to the affordable housing target that Policy CP9 is based upon. In addition, there is no evidence established in the Plan or in the GLHNA evidence base as to how Policy CP9's proposed reduced site size threshold (4+ dwellings in the Cotswolds AONB and listed designated areas) triggering affordable housing contributions has been derived; Consistent with the NPPF – without appropriate, detailed justification for the lower site size threshold proposed in CP9 the policy is not consistent with NPPF 63. 	<p>The viability evidence has been taken into account in forming policy CP9. If this were not so, based on unmet need the percentage of affordable housing required would be much higher.</p> <p>The ability to have reduced site size thresholds for the AONB and Designated Rural Areas such as Stroud rural parishes is in line with the NPPF.</p>
<p>Policy wording modifications: None</p>		
<p>Leonard Stanley Parish Council (824)</p>	<ul style="list-style-type: none"> This policy does not make sense, as the consultation clearly demonstrated the need for more affordable housing; so why in areas outside the AONB is it acceptable to ask for less affordable housing than the current plan? 	<p>This policy has been formed in line with the NPPF. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.</p>
<p>Policy wording modifications: None</p>		
<p>McLoughlin Planning for SevenHomes (880)</p>	<ul style="list-style-type: none"> The Policy is unsound in that the Plan identifies an annual unadjusted affordable housing need, which is more than 50% of the Plan's housing target. Therefore, the Policy cannot deliver enough affordable housing and fails to assist in "significantly boosting the supply of homes" as required by paragraph 59 of the Framework. 	<p>Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings OR of providing 4 or more dwellings in designated rural areas. This is clearly in line with the NPPF and will significantly boost the supply of homes. The SDLP will deliver above the minimum requirement and an element of this additional headroom will be affordable housing. The Council is also successfully delivering council housing, additional to the requirements of Policy CP9.</p>
<p>Policy wording modifications: None</p>		



Gladman Developments Ltd (905)	<ul style="list-style-type: none"> Gladman note that this update to Policy CP9 reflects the changes to affordable housing thresholds as set out in paragraph 63 of the NPPF (2019). 	Comment noted.
	<ul style="list-style-type: none"> Gladman support the flexibility provided within this policy in terms of the tenure, size and type. 	Comment noted.
	Policy wording modifications: None	
Home Builders Federation (HBF) (892)	<ul style="list-style-type: none"> Policy requirements should be unambiguous. The prefix “at least” is unclear. The Council’s viability assessment shows that affordable housing provision above 30% is not viable. Brownfield sites in the Rural West of the District and the Stroud Valleys including Sharpness are unviable, the two larger greenfield typologies on the Gloucester Fringe are only marginally viable and all except one Strategic Sites are either unviable or marginally viable (also see HBF representations under Deliverability & Viability). 	The wording ‘at least’ is included to allow flexibility in provision. Should an affordable housing provider have access to Homes England grant, for example, the percentage could exceed 30%.
	<ul style="list-style-type: none"> The requirement for provision of at least 30% affordable housing on-site on smaller sites of 4 or more dwellings in Cotswold AONB and other Designated Rural Areas may be impractical. The Council’s policy approach should be more flexible so that where appropriate commuted sums for off-site provision is also acceptable. 	The requirement is in line with the NPPF. There is no evidence to suggest that smaller numbers are not deliverable.
	Policy wording modifications:	
	<ul style="list-style-type: none"> The Council’s viability assessment shows that affordable housing provision above 30% is not viable. The prefix “at least” should be deleted. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP
RPS Group for Stroud Corporation NV (917)	<ul style="list-style-type: none"> The policy text should clarify that affordable housing is subject to viability and negotiations, to take account of the specific circumstances of individual sites, sites with exceptional development costs, development viability, the availability of public subsidy, or the realisation of other planning objectives which take priority. This is in line with the guideline contained within the NPPF on 	Viability is covered by the NPPF, and NPPF requirements are a material consideration. The policy makes clear that the Council will negotiate the tenure, size and type of affordable units on a site by site basis, having regard to housing needs, site specifics and other factors.



	affordable housing.	
	Policy wording modifications:	
	Draft Core Policy CP9 par 4 should be amended to state that ‘ In all other areas, sites capable of providing 10 or more dwellings (net), or covering a site area of 0.5 hectares or more, will be required to provide at least 30% affordable housing, subject to negotiations underpinned by viability.	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Pegasus Group for Robert Hitchins Ltd (879)	<ul style="list-style-type: none"> The LHNA20 position in Figure 91 is that c.26% of the planned supply in the Stroud Local Authority area is required as Affordable Housing and the data in Figure 91 suggests that only c.33% of this should be made available for Affordable Home Ownership. This informed by the LHNA20 approach which assumes that additional Affordable Housing does not need to be planned for households renting in the private rented sector and in receipt of Housing Benefit or who aspire to purchase but cannot, based on LHNA20 calculations, afford to do so. However, this does not reflect the NPPF Affordable Housing definition in terms of household eligibility for Affordable Home Ownership housing. If the NPPF Affordable Housing definition, in terms the eligibility for Affordable Housing of households aspiring to home ownership but unable to afford it, is taken into account then the LHNA20 data suggests that c.44% to 64% of the Affordable Housing proposed over the Plan period should be for Affordable Home Ownership with the remainder for rent. This will also see an increase in the overall quantum of Affordable Housing need concluded in the LHNA20, but clearly on the basis that majority of Affordable Housing need is for Affordable Home Ownership and with the quantum sought through policy being demonstrated to be viable 	This is a difference of interpretation; the Council does not agree but the comments are noted.



	<p>at the Plan making stage.</p> <ul style="list-style-type: none"> In terms of the form that the rented element of affordable housing need is to take the LHNA20 refers to 2,513 of the Gloucestershire wide 11,210 households in need unable to afford market rent being able to afford Affordable Rent and bases the Social Rent proportion on the remaining households (8,697) (paragraph 8.69, LHNA20). 	
<p>Policy wording modifications:</p>		
	<p>i) The latter half of the second sentence in the second paragraph of Core Policy CP9 should be amended as follows: “Affordable housing should broadly reflect the sizes, tenures and types that meet the proven needs of people whose needs are not met by the market.” (delete - who are not able to compete in the general housing market as well as reflecting the dwelling sizes and design in the proposed development)</p> <p>ii) At minimum the words ‘at least’ should be deleted from paragraphs three and four, but the primary preference is that the affordable housing proportion itself should only be proposed once the Council are in a position to have reference to robust viability evidence taking all costs to development and realistic land value benchmarks into account prior to setting the affordable housing proportion sought.</p> <p>iii) The wording of the final paragraph in Core Policy CP9 should be amended as follows: “The Council will negotiate the proportion, tenure, size and type of affordable units on a site by site basis having regard to housing needs, viability, site specifics and other factors.” In negotiating the tenure split supporting text should reference that when all households eligible for Affordable</p>	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP</p>



	<p>Housing in line with the NPPF definition are taken into account a need for more than 33% Affordable Home Ownership is suggested (NB: the requirement for Affordable Home Ownership over a 20 year period based on analysis of data within the LHNA20 applied in the context of the NPPF Affordable Housing definition could be 44% to 64% of the overall Affordable Housing need).</p> <p>iv) The above suggested amendments should be considered in light of the conclusion of these representations that Policy CP9 is, as a whole, unsound as a result of the lack of viability evidence supporting the affordable housing proportion sought (particularly when all costs to development and realistic Benchmark Land Values are applied) and the issues with the wording around housing mix. However, the proposed amendments are intended to assist should the Council determine a deliverable affordable housing proportion for inclusion within a replacement affordable housing policy.</p>	
<p>Blue Fox Planning Ltd for Persimmon Homes Severn Valley (928)</p>	<ul style="list-style-type: none"> Whilst there is no objection to the requirements of the policy, it is considered necessary that the policy wording should include greater flexibility to recognise that in some cases, due to robustly evidenced viability constraints, the achievement of 30% may not be possible. It is noted that within the preceding text to CP9 (paragraph 4.21) there is reference to circumstances such as unusually higher costs as a factor which may justify a level of affordable housing which is below the 30% requirement. However, such flexibility and recognition that such scenarios may occur should be referenced within the policy itself. 	<p>Viability considerations are reflected in the NPPF. NPPF requirements are a material consideration. The policy makes clear that the Council will negotiate the tenure, size and type of affordable units on a site by site basis, having regard to housing needs, site specifics and other factors.</p>
<p>Policy wording modifications: None</p>		
<p>Savills for L&Q Estates (913)</p>	<ul style="list-style-type: none"> We note that the Pre-Submission Plan, at paragraph 4.20, states that the viability evidence indicates the 	<p>The Council’s Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment</p>



	<p>Authority's preferred affordable housing mix is not viable, however, this isn't accurate. The Viability Assessment indicates that the sum of all the policy requirements renders the spatial strategy unviable – notwithstanding any adjustment in the expected mix.</p> <ul style="list-style-type: none"> The soundness of this policy, and the 30% affordable housing requirement, will need to be considered in the round as part of the discussions on the viability of the plan as a whole. 	has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
Policy wording modifications: None		
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> The approach in the Policy is unsound in that the Plan identifies an annual unadjusted affordable housing need, which is more than 50% of the Plan's housing target. Therefore, the Policy cannot deliver enough affordable housing and fails to assist in "significantly boosting the supply of homes" as required by paragraph 59 of the Framework. 	Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings OR of providing 4 or more dwellings in designated rural areas. This is clearly in line with the NPPF and will significantly boost the supply of homes.
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> The approach in the Policy is unsound in that the Plan identifies an annual unadjusted affordable housing need, which is more than 50% of the Plan's housing target. Therefore, the Policy cannot deliver enough affordable housing and fails to assist in "significantly boosting the supply of homes" as required by paragraph 59 of the Framework. 	Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings OR of providing 4 or more dwellings in designated rural areas. The SDLP will deliver above the minimum requirement and an element of this additional headroom will be affordable housing. The Council is also successfully delivering council housing, additional to the requirements of Policy CP9. This is clearly in line with the NPPF and will significantly boost the supply of homes.
Policy wording modifications: None		
RCA Regeneration Ltd for Land Development and Estates Ltd (861)	<ul style="list-style-type: none"> The provision of affordable housing could be raised to 40% and it is unclear why 30% was selected. The Council will not begin to address its affordable housing needs until it raises its ambitions. 	Viability evidence has been taken into account in forming policy CP9. More ambitious targets would not be viable.
Policy wording modifications: None		
RCA Regeneration Ltd for Piper Homes (877)	<ul style="list-style-type: none"> The provision of affordable housing could be raised to 40% and it is unclear why 30% was selected. The Council will not begin to address its affordable housing needs until it raises its ambitions. 	Viability evidence has been taken into account in forming policy CP9. More ambitious targets would not be viable.



	Policy wording modifications: None	
The Planning Bureau Ltd for McCarthy and Stone Retirement Lifestyles Ltd (675)	<ul style="list-style-type: none"> The conclusions of the Stroud District Council Local Plan Viability Assessment does not in our view provide a credible basis for proving a flat 30% affordable housing rate across the Authority. 	The Council's Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> The Local Plan Viability Assessment concludes that neither sheltered housing or extra care accommodation can support affordable housing contributions of 30%. We support this, albeit we consider that the viability of older persons' housing typologies has been overstated, as several the viability assumptions do not reflect our experience in bringing these forms of development forward (See Review of Local Plan Viability Assessment). 	
	Policy wording modifications:	
	<p>We would recommend a supplemental sub-clause to Policy CP9 which reads as follows:</p> <ul style="list-style-type: none"> Specialist older persons' housing including sheltered and extra care accommodation will not be required to provide an affordable housing contribution 	All suggested policy wording modifications will be considered by the Inspectors at the EIP
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		



CP10

Core Policy CP10 - Gypsy, Traveller and Travelling Showpeople Sites			
Number of representations: 3	Support: 2	Object: 0	Comment: 1
Stakeholders	Comments	Stroud District Council Response	
Support			
No comments received	Policy wording modifications: None		
Object			
No comments received	Policy wording modifications: None		
Comment			
Black Box Planning for Taylor Wimpey UK Limited (936)	<ul style="list-style-type: none"> As a matter of principle, TW support the identification of land for Gypsy, Traveller and Travelling Show People and recognise the need for such provision in plan making. However, for the reasons set out below, objections are submitted to the requirement for such provision within the G2 site (land at Whaddon). Policy G2 concerning land at Whaddon includes a requirement for a serviced site comprising 8 plots for travelling showpeople. In considering the appropriateness of this requirement, policy CP10 provides for a sequential approach for such provision. It is necessary that the local plan presents suitable and robust evidence to demonstrate that no alternatives opportunities for the serviced plots within the first and second preference of CP10 exist within the Gloucester urban area and Gloucester fringe area. It is apparent that the need has been casually cast into the Whaddon strategic site. The suitability of Whaddon or reasonable alternatives has not been tested and the requirement with policy G2 is therefore not justified. Evidence of testing of alternative sites in accordance with the sequential preference of Policy CP10 is not evident. Specifically, 	<p>The requirement to assess the accommodation needs of Gypsies and Travellers, Showpeople, non-Gypsy and Traveller Gypsy and Traveller residential caravan dwellers, and boat dwellers is established through national guidance contained in Planning Policy for Traveller Sites (DCLG, 2015).</p> <p>The Council's Duty to Cooperate Statement (EB3) sets out within it an agreed Statement of Common Ground with adjoining Gloucestershire authorities that states "Gloucester City has a tightly drawn local authority boundary, with significant planning constraints and a limited land supply. It is accepted that there are no deliverable sites within the administrative area of Gloucester City and that consequently, there are currently unmet needs relating to the Gypsy, Traveller and Travelling Showpeople communities. It is therefore necessary to consider how neighbouring authorities can assist with addressing these unmet needs."</p> <p>The District Council has discussed the potential for intensifying or extending existing Travelling Showpeople sites within Stroud District with existing owners and the conclusion reached is that an additional site is required to meet Gloucester's needs.</p> <p>The site at Whaddon is being proposed to meet Gloucester's needs as it is not functionally linked to Stroud's settlements. Given the potential for a large strategic site to be masterplanned in such a way that a site for Travelling Showpeople could be accommodated within its boundaries, with good links to Gloucester, the Council considers the allocation of land within this site in this</p>	



Core Policy CP10 - Gypsy, Traveller and Travelling Showpeople Sites		
	<p>the City Council propose to allocate the site for residential development (approximately 300 dwellings under policy SA11 of the Pre-submission Gloucester City Plan) with no attempt to integrate provision for travelling show people as part of the scheme, presumably in recognition that the uses are not considered compatible in either commercial or practical planning terms. That being the case, the imposition of the requirement within the G2 policy demonstrates inconsistent practice on the part of the City Council’s when dealing with its own land holdings and privately controlled land. Object to the requirement for 8 serviced pitches in policy on the Whaddon site for compatibility concerns and due to the distinct lack of evidence to justify the requirement including the testing of reasonable alternatives. Policy CP10 implies that the provision is not normally compatible with neighbouring residential uses as well as stipulating other criteria. The provision of pitches for travelling showpeople will impact on the neighbouring residential amenity or the amenity of the planned new schools. It is considered therefore, that the requirement for 8 serviced pitches is not compatible with a residential masterplan for the site. It’s location and context is not optimum for commercial vehicle movements accessing the motorway network. In this regard, there are sequentially preferable locations for uses that may involve commercial vehicle traffic.</p>	<p>location to be appropriate.</p> <p>Ahead of the EIP, the Council is updating its GTAA evidence base and documentation. This will be published in due course.</p>
	<p>Policy wording modifications:</p>	
	<ul style="list-style-type: none"> The allocation policy G2 should be modified to delete the requirement for 8 serviced plots for travelling showpeople. The site is not suitable, and its 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>



Core Policy CP10 - Gypsy, Traveller and Travelling Showpeople Sites		
	<p>identification is contrary to the sequential approach set out by CP10. There is no robust evidence to demonstrate that there are no better located or better suited sites for the required provision. Preparing a planning application for the Whaddon site following a comprehensive approach to masterplanning underpinned by technical evidence. The masterplan approach has also emerged following dialogue with L&Q Estates and Newland Homes who control other land within the proposed G2 site. The masterplan does not include provision for travelling showpeople plots for the reasons outlined above. The Whaddon site is being promoted by residential developers and the scheme requires very substantial contributions towards infrastructure provision including major highway improvements and provision of a new secondary school and primary school. The masterplan viability does not identify excess land for travelling showpeople serviced plots.</p>	
Other representations	Issues raised	Stroud District Council Response
Traveller Needs		
423	<ul style="list-style-type: none"> Not enough sites have been allocated to travellers. Also we have one traveller who has a horse drawn caravan who stops overnight on some of our wide grass vergers. These need to be kept. 	<p>Comment noted. The Gloucestershire local authorities of Cheltenham Borough Council, Cotswold District Council, Forest of Dean District Council, Gloucester City Council, Stroud District Council, Tewkesbury Borough Council, and Gloucestershire County Council commissioned RRR Consultancy Ltd to undertake a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) for the period 2021-2041 (2040 in relation to Stroud). The results will be used as an evidence base and supersede any previous GTAA (including any levels of accommodation needs calculated prior to this assessment) for the Gloucestershire local planning authorities. Ahead of the EIP, the new evidence base and documentation will be published shortly.</p>
Policy wording modifications: None		

Core Policy DHC1 - Meeting housing need within defined settlements				
Number of representations: 6		Support: 2	Object: 2	Comment: 2
Stakeholders	Comments		Stroud District Council Response	
Support				
Savills (UK) Limited for Coln Residential (934)	<ul style="list-style-type: none"> Support the principle of Policy DHC1. Request review of the settlement development limit at North Woodchester to include, as a minimum, the extent of already committed development and potentially existing employment land to the north. 		Support noted.	
	<p>Policy wording modifications: None</p>			
Object				
Chilmark Consulting for Charterhouse Strategic Land (865)	<ul style="list-style-type: none"> The policy does not specify the detailed criteria for meeting housing need at settlements. 		The supporting text explains that the detailed criteria for housing within SDLs are set out in Policy HC1 (para. 4.33).	
	<ul style="list-style-type: none"> The policy is vague and uncertain with respect to meeting housing needs: <ul style="list-style-type: none"> Referenced criteria in HC1 do not include housing need: Local housing need not identified Relevant geographic scale not identified by parish or cluster Where to find housing need information 		The policy is not vague or uncertain about meeting housing needs. Core policies relating to housing needs are set out in Core Policies CP7 and CP8 (for example). This delivery policy is about where housing needs should be met. It introduces settlement development limits, sets out what they seek to achieve and signposts to detailed criteria to be applied. It is very clear and unambiguous.	
	<ul style="list-style-type: none"> The LHNA does not provide sub-District housing needs analysis. <ul style="list-style-type: none"> No reference in LHNA or the Plan of the range of types, tenures or sizes of dwellings needed for specific Parish Cluster areas. 		Data set out within the Local Housing Need Assessment (EB10) is provided mainly at District level, but the consultants did undertake analysis at sub-District level and this information will be made available.	
	<p>Policy wording modifications:</p> <ul style="list-style-type: none"> Re-draft the whole policy wording in a clear and understandable manner. 		All suggested policy wording modifications will be considered by the Inspectors at the EIP.	
	<ul style="list-style-type: none"> Set out precisely what the local housing needs for settlements and Parish Cluster areas are and where that evidence may be found. 		All suggested policy wording modifications will be considered by the Inspectors at the EIP.	



Core Policy DHC1 - Meeting housing need within defined settlements		
Gladman Developments Ltd (905)	<ul style="list-style-type: none"> The policy should be amended to be flexible enough to accommodate sustainable new development outside of existing settlement development limits subject to specified policy criteria: <ul style="list-style-type: none"> Reference to policy GD2 of the Harborough Local Plan 	It is appropriate to manage development through the use of settlement development limits, which provide a clear and unambiguous tool. This is a principle supported through successive Stroud local plans. However, the SDLP does include policies which provide for development outside of SDLs, where appropriate. Policy CP15 sets out the circumstances where it may be appropriate. A new addition to this plan, policy DHC2 provides for small housing schemes at smaller settlements in the interests of social sustainability.
	Policy wording modifications:	
	<ul style="list-style-type: none"> The policy should be amended to incorporate a criteria based policy such as policy GD2 of the Harborough Local Plan as an example, which states: <ul style="list-style-type: none"> “in addition to sites allocated by this Local Plan and neighbourhood plans, development within or contiguous with the existing or committed built up area of Market Harborough, Key Centres, the Leicestershire Principal Urban Area (PUA), Rural Centres and Selected Rural Villages will be permitted where...” A series of criteria then follows. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Comment		
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> Policy DHC1 appears to contradict the development strategy diagrams on page 57 of the eSDLP and Core Policy CP3: <ul style="list-style-type: none"> CP3 appears to suggest that small housing schemes adjoining the settlement development limit (ie on the outside edge) will be acceptable, subject to meeting criteria and other policies in tier 3b and 4 settlements. Policy DHC1 appears to refer to villages but limits development to within their defined edges. 	There is no contradiction between Policy DHC1 and CP3. Policy DHC1 only refers to support development within settlement development limits (SDLs). It does not provide policy for development outside and/or adjoining those limits. In the case of development outside but adjoining SDLs on the edge of settlements, Policy CP3 states that this type of development is “subject to meeting criteria set out in the Plan’s Core and Delivery policies”. Policies DHC2, HC3, HC4 set out the types of housing that can be delivered outside SDLs. The development strategy diagrams on page 56 and 57 simply reflect and summarise these various policy requirements.
	Policy wording modifications: None	



Core Policy DHC1 - Meeting housing need within defined settlements		
RPS Group for Redrow Homes Ltd (948)	<ul style="list-style-type: none"> The boundary of strategic allocation sites should be included within the defined settlement limits of the Local Plan proposals maps: <ul style="list-style-type: none"> The location of strategic site allocations outside of defined settlement limits would appear to conflict with Policy CP15. 	<p>Policy CP2 makes very clear that development will take place at strategic development sites allocated in the SDLP, within settlement development limits and limited development elsewhere in accordance with other policies of the Plan. This includes Policy CP15.</p> <p>The main reason why allocated sites are not shown within SDLs, is because they are yet to be developed and SDLs show the boundaries of existing settlements. If an allocated site were not to come forward in a comprehensively planned manner, inclusion of the site within SDLs could allow for a smaller speculative scheme to be justified in a manner contrary to the aims of SDLs and the Local Plan.</p>
	Policy wording modifications:	
	<ul style="list-style-type: none"> Land included within strategic development sites should be included within the defined settlement boundaries for each corresponding settlement. <ul style="list-style-type: none"> Site G1 – Land South of Hardwicke should be included within the defined settlement limits of Hardwicke. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		



Delivery Policy DHC2 - Sustainable rural communities				
Number of representations: 14		Support: 4	Object: 4	Comment: 6
Stakeholders	Comments		Stroud District Council Response	
Support				
North Nibley Parish Council (875)	<ul style="list-style-type: none"> Support proposed new policy DHC2 to help maintain the social sustainability of smaller rural settlements including North Nibley subject to the detailed criteria set out in the draft Policy. 		Support noted.	
Policy wording modifications: None				
Savills (UK) Limited for The Berkeley Estate (878)	<ul style="list-style-type: none"> Support the principle of Policy DHC2 (Sustainable rural communities), which seeks to encourage smaller housing schemes up to nine dwellings at Tier 3b and Tier 4 settlements. 		Support noted.	
Policy wording modifications: None				
Object				
Livedin Custom Build (407)	<ul style="list-style-type: none"> Noted absence of 'made' Neighbourhood Development Plans in the District: <ul style="list-style-type: none"> 8 made NDPs listed on website out of 55 settlements listed in CP3 Settlement Hierarchy. Drafting NDPs is a complex and time consuming process. Opportunity for publicly funded housing need surveys. 		The NPPF makes clear that NDPs play an important role in helping communities develop a shared vision for their area. The District Council has a dedicated neighbourhood planning officer to support local communities to develop NDPs. Good progress is being made within Stroud District towards the preparation of NDPs. Nevertheless, the policy also provides for communities who do not have an NDP to be able to support development outside of SDLs. The District Council also facilitates the preparation of housing needs surveys by parish councils.	
	<ul style="list-style-type: none"> Absence of 'made' NDPs will limit effectiveness of Delivery Policy DHC2. 		Disagree. The policy also provides for communities who do not have an NDP to be able to support development outside of SDLs.	
Policy wording modifications:				
	<ul style="list-style-type: none"> Amend criteria 3: the proposal is included within a Neighbourhood Development Plan, <i>is supported by the relevant parish council, or clear evidence from a public consultation or an independent housing need survey.</i> 		All suggested policy wording modifications will be considered by the Inspectors at the EIP.	

Delivery Policy DHC2 - Sustainable rural communities		
SF Planning Limited (642)	<ul style="list-style-type: none"> The policy should be widened to all settlements to support sustainable development and boost housing delivery. 	The SDLP provides for the District's housing requirements to be met in sustainable locations. The development strategy based on settlement development limits has operated well in Stroud District and the adopted Stroud Local Plan has boosted housing delivery considerably since 2015, whilst retaining a clear unambiguous policy on development outside SDLs. Apart from very small settlements, where opportunities within SDLs are limited or non-existent, the social sustainability of communities can be met through housing development on sites within SDLs.
Policy wording modifications: None		
Comment		
RCA Regeneration Ltd for Land Development and Estates Ltd (861)	<ul style="list-style-type: none"> Criteria 3, parish council support, is not appropriate as it polices housing delivery; <ul style="list-style-type: none"> Evidence of appeal success when parish councils object to development People in housing need often outside planning process 	The policy provides for parish councils who have yet to produce an NDP to identify a housing need and to seek to address it through the Local Plan. This provides flexibility particularly for smaller communities who may not have the resources to develop a NDP.
	<ul style="list-style-type: none"> Further justification is required in terms of the 10% upper limit: <ul style="list-style-type: none"> Allocations already leading to expansions greater than 10%. 	10% is considered to provide reasonable opportunities for smaller communities to support small schemes, whilst preventing growth proposals more appropriately located within more sustainable settlements. There are no current allocations at very small settlements so this is not a relevant point.
Policy wording modifications: None		
RCA Regeneration Ltd for Piper Homes (877)	<ul style="list-style-type: none"> Criteria 3, parish council support, is not appropriate as it polices housing delivery; <ul style="list-style-type: none"> Evidence of appeal success when parish councils object to development People in housing need often outside planning process 	The policy provides for parish councils who have yet to produce an NDP to identify a housing need and to seek to address it through the Local Plan. This provides flexibility particularly for smaller communities who may not have the resources to develop a NDP.
	<ul style="list-style-type: none"> Further justification is required in terms of the 10% upper limit: <ul style="list-style-type: none"> Allocations already leading to expansions greater than 10%. 	10% is considered to provide reasonable opportunities for smaller communities to support "very limited development" (CP3), whilst preventing growth proposals more appropriately located within more sustainable settlements.



Delivery Policy DHC2 - Sustainable rural communities		
	Policy wording modifications: None	
Gladman Developments Ltd (905)	<ul style="list-style-type: none"> Support policy flexibility for some development to come forward outside settlement development limits at Tier 4 settlements. 	Support noted.
	<ul style="list-style-type: none"> Flexibility should allow for schemes of an appropriate size, in relation to the settlement, to come forward and should not be restricted to schemes of up to 9 dwellings. 	The policy is predicated on small schemes coming forward in the context of “some” and “very limited development” for tiers 3b and 4 tier settlements where allocations would not be appropriate. 10 or more dwellings would constitute major development and would undermine the development strategy which seeks to locate larger development to the more sustainable settlements with SDLs.
	Policy wording modifications: None	
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> The defined criteria are too restrictive and will preclude sustainable development: <ul style="list-style-type: none"> Preclude development in the absence of a Neighbourhood Plan. 	The criteria are not too restrictive. The policy provides for parish councils who have yet to produce an NDP to identify a housing need and to seek to address it through the Local Plan. This provides flexibility particularly for smaller communities who may not have the resources to develop a NDP.
	<ul style="list-style-type: none"> Only Criteria 1 and 2 should be retained. 	Criteria 3 and 4 are important for ensuring that the type and level of development meets the needs of specific small settlements for “some” and “very limited development” (CP3) and criteria 5 is essential to ensure this form of development aligns with other forms of housing which need to comply with Delivery Policy HC1.
	Policy wording modifications: None	
BBA Architects for Vistry Group (912)	<ul style="list-style-type: none"> No justification for restricting Delivery Policy DHC2 to Tier 3b and 4 settlements. 	The SDLP provides for the District’s housing requirements to be met in sustainable locations. The development strategy based on settlement development limits has operated well in Stroud District and the adopted Stroud Local Plan has boosted housing delivery considerably since 2015, whilst retaining a clear unambiguous policy on development outside SDLs. Apart from very small settlements, where opportunities within SDLs are limited or non-existent, the social sustainability of communities can be met through housing development on sites within SDLs.
	<ul style="list-style-type: none"> No justification for arbitrary limit of 9 dwellings. <ul style="list-style-type: none"> Larger schemes could be more appropriate to help the sustainability of a settlement or wider community. 	The policy is predicated on small schemes coming forward in the context of “some” and “very limited development” for tiers 3b and 4 tier settlements where allocations would not be appropriate. 10 or more dwellings would constitute major development and would undermine the development



Delivery Policy DHC2 - Sustainable rural communities		
		strategy which seeks to locate larger development to the more sustainable settlements with SDLs.
Policy wording modifications: None		
Chalford Parish Council (947)	<ul style="list-style-type: none"> • Misguided change of policy. 	The District Council has listened to local residents asking for more flexibility in the delivery of rural housing policy.
	<ul style="list-style-type: none"> • Will render settlement development limits porous and almost impossible to defend. 	Provided that the criteria are retained within the policy, the policy provides for measurable limits to development which can be monitored and enforced.
	Policy wording modifications: None	
Other representations	Issues raised	Stroud District Council Response
216	<ul style="list-style-type: none"> • Future new build should have sustainability measures designed-in with regard to environmental issues and to reduce pressure on local resources: <ul style="list-style-type: none"> ○ Solar panels, photo voltaic and 'wet' panels for solar heating of water, ○ Heat pumps and underfloor heating to increase efficiency and reduce CO² output, ○ Built in rainwater harvesting to capture run-off in wet weather and reduce pressure on water supply in dry weather. 	The SDLP includes a range of policies which provide for these types of sustainable measures, including policies CP14, DES3, ES4.
Policy wording modifications: None		

Delivery Policy HC2 - Providing new homes above shops in our town centres				
Number of representations: 3		Support: 3	Object: 0	Comment: 0
Stakeholders	Comments		Stroud District Council Response	
Support				
Cotswold Land & Property Ltd (170)	<ul style="list-style-type: none"> The policy should make specific reference to conversion of such premises to HMOs: <ul style="list-style-type: none"> Evidence of demand from tenants. Town centre location close to sustainable transport/ employment. 		Support noted. There are many forms of housing which might be appropriate within upper floors above shops and offices. The policy does not seek to prescribe the form of accommodation, provided the building is suitable for conversion and the result is accommodation with suitable living conditions.	
Policy wording modifications: None				
Object				
No comments received				
Policy wording modifications: None				
Comment				
No comments received				
Policy wording modifications: None				
Other representations	Issues raised		Stroud District Council Response	
214	<ul style="list-style-type: none"> Retail presence must not be prejudiced by loss of frontage. 		This policy provides for the use of upper floors where this does not threaten the continued ground floor commercial use or the vitality of the town centre or create amenity or parking problems.	
214	<ul style="list-style-type: none"> Support mixed use/ live Work use model providing retail with a flat above to underpin town centre vitality and vibrancy. 		Support noted. There are many forms of housing which might be appropriate within upper floors above shops and offices. The policy does not seek to prescribe the form of accommodation, provided the building is suitable for conversion and the result is accommodation with suitable living conditions.	
Policy wording modifications: None				

Delivery Policy HC3 - Self-build and custom-build housing provision				
Number of representations: 19		Support: 6	Object: 7	Comment: 6
Stakeholders	Comments		Stroud District Council Response	
Support				
Savills (UK) Limited for The Berkeley Estate (878)	<ul style="list-style-type: none"> The requirement for a provision of 2% of self-build and custom-build homes at Policy HC3, subject to demand, is supported on the basis that it shows flexibility in accordance with national policy objectives 		Comment noted	
Policy wording modifications: None				
Savills (UK) Limited for Coln Residential (934)	<ul style="list-style-type: none"> The requirement for a provision of 2% of self-build and custom-build homes at Policy HC3, subject to demand, is supported on the basis that it shows flexibility in accordance with national policy objectives 		Comment noted	
Policy wording modifications: None				
Object				
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> It is not clear where the evidence exists that show 2% of strategic sites will be taken up by custom or self-build builders or that given choice, 2% would prefer to choose smaller sites and windfall sites? 		Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council's approach to identifying and assessing housing needs including self-build and custom-build.	
Policy wording modifications: None				
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> The allocations in the Local Plan set out a series of competing requirements which mean that opportunities for self-build are extremely limited and present more logistical challenges for a developer in terms of: <ul style="list-style-type: none"> Where those self-build plots will be located, meeting market expectations. Timetable for delivery of plots. Land availability. 		<p>The site allocation policies set out the requirements for delivering high quality sustainable development at strategic and local allocation sites and are subject to viability testing.</p> <p>Delivery Policy HC3 and supporting text paragraphs 4.40 – 4.44 set out the Council's approach to supporting self-build and custom-build provision including matters of delivery and detail.</p>	
Policy wording modifications: None				



Delivery Policy HC3 - Self-build and custom-build housing provision		
<p>Pegasus Group for Robert Hitchins Ltd (879)</p>	<ul style="list-style-type: none"> • The legislation is not worded in such a way that it empowers local authorities to place restrictions on the use of land to deliver self-build units. The wording enables local authorities to permit the use of suitable land for this purpose, as opposed to restricting it to be used for this purpose. • Clear evidence supporting the need to include this as a policy requirement is not provided by the Council. Simply referring to a waiting list of households on the self- / custom-build register, whilst relevant to the Council in determining their own obligation to permit a specific number of such plot applications, will not be sufficient to pass the tests applicable to the imposition of planning obligations or to justify the inclusion of policies to impose such planning obligations. • Falling short of the number of permissions required to address demand on the register is not a robust justification for the imposition of blanket policy requirements for such plots to be provided from privately owned housing sites – the ‘duty to grant planning permission’ imposed by the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) lies with local authorities; not with landowners. 	<p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council’s approach to identifying and assessing housing needs including self-build and custom-build.</p>
Policy wording modifications:		
	<p>i) The wording of Delivery Policy HC3 should either be deleted in its entirety or be amended as follows to make it clear the Council will not impose a requirement for plots upon development proposals: “The Council supports the provision of self-build</p>	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP</p>



Delivery Policy HC3 - Self-build and custom-build housing provision	
	<p>and custom-build dwellings within settlement development limits subject to satisfying all relevant policy criteria. In addition, at strategic sites allocated within this Local Plan and in addition to the affordable housing component, (delete - a minimum of 2% of the dwellings shall be provided as) the Council will encourage development proposals which provide plots suitable for self- or custom-build in order to meet Government aspirations to increase self build developments, subject to appropriate demand being identified. In determining the nature and scale of any provision, the Council will have regard to site-specific circumstances and local demand.</p> <p>All self build and custom build schemes will:</p> <ol style="list-style-type: none"> 1. be individually designed and bespoke to that household, employing innovative approaches throughout that cater for changing lifetime needs 2. provide appropriate linkages to infrastructure and day to day facilities 3. Include a design framework, submitted with the full or reserved matters planning application for the wider site, to inform detailed design of the individual units, where more than one self-build unit is proposed 4. satisfy the detailed criteria defined for meeting housing need at settlements. <p>At Allocated Strategic sites, where it is agreed that an element of self- or custom- build plots will be provided development briefs will set out how the self-build plots will be delivered. "(delete - and integrated into the wider scheme.)"</p>



Delivery Policy HC3 - Self-build and custom-build housing provision		
RPS Group for Redrow Homes Ltd (948)	<ul style="list-style-type: none"> • Policy HC3 contradicts the strategy set out in Policy CP3 which outlines that self-build plots are best located within Tier 1 settlements and Local Service Centres Tier 2 settlements only. • Self build plots should not be allowed to follow their own design framework but instead have to compliment and integrate into the character and design of the wider strategic site – it is not for the wider site to integrate with them. • Self-build plots should be allocated /located in one specific area of strategic site so as to not conflict or cause operational impacts upon the main build of the strategic site 	<p>Core Policy CP3 supports infill and re-development, including self-build and custom-build, within settlement development limits at Tier 1 - 4 settlements. Figure 3 highlights where additional policy support seeks to bring forward self-build and custom-build development, including at strategic allocations at Tier 1 and Tier 2 settlements, and in specific circumstances on suitable sites adjoining settlement development limits at Tier 1 – 4 settlements.</p> <p>Delivery Policy HC3 sets out a policy requirement at strategic sites for development briefs to set out how the self-build plots will be delivered and integrated into the wider scheme. Supporting text paragraph 4.43 provides further detail on how subsequent applications for the individual self-build dwellings should accord with the agreed design framework for the development.</p>
Policy wording modifications: None		
	<ul style="list-style-type: none"> • Policy HC3 should only be applicable to sites within Tier 1 settlements and Local Service Centres Tier 2 settlements in accordance with the strategy set out in Core Policy CP3. • Criterion 1 should be re-worded to read: “be individually design and bespoke to that household but compliment the context, design and character of the wider strategic site, employing innovative approaches throughout that cater for changing lifetime needs”. • The policy should make an allowance for a claw back mechanism should there be no interest in taking up the self-build plots within the first 5 years of the development commencing on the strategic site. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> • The allocations in the Local Plan set out a series of competing requirements which mean that opportunities for self-build are extremely 	<p>The site allocation policies set out the requirements for delivering high quality sustainable development at strategic and local allocation sites and are subject to viability testing.</p>



Delivery Policy HC3 - Self-build and custom-build housing provision		
	<p>limited and present more logistical challenges for a developer in terms of:</p> <ul style="list-style-type: none"> ○ Where those self-build plots will be located, meeting market expectations. ○ Timetable for delivery of plots. ○ Land availability. 	<p>Delivery Policy HC3 and supporting text paragraphs 4.40 – 4.44 set out the Council’s approach to supporting self-build and custom-build provision including matters of delivery and detail.</p>
Policy wording modifications: None		
<p>McLoughlin Planning for Terra Strategic (848)</p>	<ul style="list-style-type: none"> ● The allocations in the Local Plan set out a series of competing requirements which mean that opportunities for self-build are extremely limited and present more logistical challenges for a developer in terms of: <ul style="list-style-type: none"> ○ Where those self-build plots will be located, meeting market expectations. ○ Timetable for delivery of plots. ○ Land availability. 	<p>The site allocation policies set out the requirements for delivering high quality sustainable development at strategic and local allocation sites and are subject to viability testing.</p> <p>Delivery Policy HC3 and supporting text paragraphs 4.40 – 4.44 set out the Council’s approach to supporting self-build and custom-build provision including matters of delivery and detail.</p>
Policy wording modifications: None		
<p>SF Planning Limited (642)</p>	<ul style="list-style-type: none"> ● The scope for self build should be widened to meet the need on Stroud’s register and to comply with the Self Build and Custom Build Housing Act and NPPF. At present it doesn’t support the delivery of larger scale self build projects in generally sustainable locations. 	<p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council’s approach to identifying and assessing housing needs including self-build and custom-build.</p>
Policy wording modifications: None		
<p>Black Box Planning for Taylor Wimpey UK Limited (936)</p>	<ul style="list-style-type: none"> ● This requirement is inconsistent with NPPF (2021) paragraph 65 which exempts self-build development schemes from the minimum requirement of 10% affordable housing. Essentially, national policy recognises the reality that self-build development schemes by their nature cannot be expected to deliver affordable housing, yet the expectation of policy HC3 is that 	<p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council’s approach to identifying and assessing housing needs including affordable housing, self-build and custom-build.</p> <p>The NPPF does not exempt self build developments from providing affordable homes. The reference in paragraph 65 is only for major development proposals and only exempts self build developments from providing 10% affordable home ownership.</p>



Delivery Policy HC3 - Self-build and custom-build housing provision		
	strategic sites will deliver 30% affordable housing and 2% self-build or custom build plots.	
Policy wording modifications: None		
Wotton Under Edge Town Council (696)	<ul style="list-style-type: none"> Development must take into account its impact on the landscape value. 	Any proposed development located outside but adjoining settlement development limits will also need to satisfy the policy requirements of Core Policy CP15 A quality living and working countryside for appropriate exceptional development together with Delivery Policies HC1 Detailed criteria for housing developments and ES7 Landscape character.
Policy wording modifications: None		
Home Builders Federation (HBF) (892)	<ul style="list-style-type: none"> There is no legislative or national policy basis for imposing an obligation on landowners or developers of strategic sites to set aside a minimum of 2% as serviced plots for self and custom build housing. Concern that by focussing on strategic sites the Council is supporting serviced plots on the sort of sites that do not normally appeal to those wishing to build their own home and limits choice for those wishing to build on smaller sites in or close to village locations Custom build plots on strategic sites adds to the complexity and logistics of developing such sites and therefore potentially slower delivery Where plots are not sold, the Council's policy should be clear as to when these revert to the original developer. It is unclear if this policy requirement has been included in the appraisal of Strategic Sites 	<p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council's approach to identifying and assessing housing needs including self-build and custom-build.</p> <p>To address detailed design and delivery matters, supporting text 4.44 states "The District Council has joined a Self Build Partnership with South Gloucestershire Council, to provide guidance and support for communities and developers to enable the delivery of self build plots. The Council will also investigate opportunities for self-build and custom-build housing on Council owned land. A Supplementary Planning Document will be produced to support the delivery of self build and custom dwellings."</p>
Policy wording modifications: None		
Livedin Custom Build (407)	<ul style="list-style-type: none"> Why would a housebuilder/ developer of a larger strategic site set out to demonstrate demand for self/ custom build in order to supply 2% of their site as self-build plots, when delivering plots is 	Many forms of residential development on a strategic site (for example sheltered housing, self-build, affordable housing) are not delivered by general market housebuilders, but are delivered by other specialist providers. It is important that these specialist providers are provided with site opportunities



Delivery Policy HC3 - Self-build and custom-build housing provision		
	<p>not part of their business model? They simply won't. We therefore argue that this draft policy is not SOUND because it will not be EFFECTIVE - it will not deliver plots.</p>	<p>through the planning process.</p>
Policy wording modifications:		
	<ul style="list-style-type: none"> • Re-drafted policy HC3 In order to boost the supply of suitable serviced plots with planning for self and custom builders, Self and Custom Housebuilding schemes of up to 9 plots will be supported on sites outside settlement development limits at tier 1 to 4 settlements, providing all of the following criteria are met: the proposed housing will consist of types, and sizes that seek to address demonstrable demand either on the Self Build Registers or other demand sources (as set out in the NPPG Feb 2021). the site adjoins settlement development limits or would fill in an otherwise built up frontage close to settlement development limits in a manner that would be in accordance with the settlement pattern, the local environment, character and landscape setting of the settlement For schemes of 4 or more dwellings, where 30% affordable housing is required, this requirement will be met by the provision of affordable plots (as defined in our modification to policy CP9). Affordable plots will be made available for those in need with a strong local connection. Appropriate legal agreements will be entered into to ensure that such dwellings will remain available as affordable housing for local need, 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>



Delivery Policy HC3 - Self-build and custom-build housing provision		
	with the necessary management of the scheme in place.	
Comment		
No comments received		
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Support		
2,16,86, 214	<ul style="list-style-type: none"> General Support of the Policy 	Comment noted
Object		
672	<ul style="list-style-type: none"> Too many hurdles and competing policies which override the Self build policy thus making it useless and ineffective. 	Delivery Policy HC3 and supporting text paragraphs 4.40 – 4.44 set out the Council’s approach to supporting self-build and custom-build provision including matters of delivery and detail. Plots are already being secured on strategic sites.
Policy wording modifications: None		

Delivery Policy HC4 - Local housing need (exception sites)				
Number of representations: 14		Support: 8	Object: 4	Comment: 2
Stakeholders	Comments		Stroud District Council Response	
Support				
RCA Regeneration Ltd for Land Development and Estates Ltd (861)	<ul style="list-style-type: none"> Criteria 3 - Edge of settlement sites very difficult to define. 		Comment not relevant to this Policy.	
	<ul style="list-style-type: none"> Criteria 5 – It would not result in biodiversity net loss, would be preferable. 		Comment not relevant to this Policy.	
	<ul style="list-style-type: none"> Criteria 7 – There should be reference to SPD or specific design standards. 		Comment not relevant to this Policy.	
	Policy wording modifications: None			
North Nibley Parish Council (875)	<ul style="list-style-type: none"> Supports policies designed to tackle the shortage of affordable housing working with Parish Councils including rural exception sites Policy HC4. 		Support noted.	
	Policy wording modifications: None			
RCA Regeneration Ltd for Piper Homes (877)	<ul style="list-style-type: none"> Criteria 3 - Edge of settlement sites very difficult to define. 		Comment not relevant to this Policy.	
	<ul style="list-style-type: none"> Criteria 5 – It would not result in biodiversity net loss, would be preferable. 		Comment not relevant to this Policy.	
	<ul style="list-style-type: none"> Criteria 7 – There should be reference to SPD or specific design standards. 		Comment not relevant to this Policy.	
	Policy wording modifications: None			
Savills (UK) Limited for The Berkeley Estate (878)	<ul style="list-style-type: none"> Welcomes amendment to criterion 3 ensuring that all affordable homes coming forward on exception sites are available in perpetuity. 		Support noted.	
	Policy wording modifications: None			
Tetlow King Planning for South West Housing Association Planning Consortium (HAPC) (885)	<ul style="list-style-type: none"> Support policy proposals to introduce exception sites to meet identified needs. <ul style="list-style-type: none"> Additional opportunity for Housing Associations to meet identified housing needs. 		Support noted.	
	<ul style="list-style-type: none"> Support cross-subsidy on exception sites with an element of market housing to facilitate affordable 		Support noted.	



Delivery Policy HC4 - Local housing need (exception sites)		
	housing delivery.	
Policy wording modifications: None		
Gladman Developments Ltd (905)	<ul style="list-style-type: none"> Supportive of policy approach to delivering affordable housing on exception sites in Tier 3 or above. 	Support noted.
	<ul style="list-style-type: none"> Support cross-subsidy on exception sites with some market housing where this required to make a scheme viable. 	Support noted.
	Policy wording modifications: None	
Savills (UK) Limited for Coln Residential (934)	<ul style="list-style-type: none"> Welcomes amendment to criterion 3 ensuring that all affordable homes coming forward on exception sites are available in perpetuity. 	Support noted.
	Policy wording modifications: None	
Object		
Livedin Custom Build (407)	<ul style="list-style-type: none"> Excluding self-build cross subsidy through a proportion of market self-build plots creates a bias against self build housing in favour of developer-led housing. 	Comment noted.
	<ul style="list-style-type: none"> Para 4.46 excludes the opportunity for a landowner, their agent or self-build enabler to bring forward a single rural exception self or custom build opportunity on behalf of an as-yet un-identified end occupier. 	This policy is intended to meet identified need.
	<ul style="list-style-type: none"> Para 4.47 excludes affordable self-build on rural exception sites - where the end occupant takes ownership of their home. 	This policy is intended to meet identified need.
	Policy wording modifications:	
	<ul style="list-style-type: none"> The Council will consider the inclusion of some market housing on affordable housing sites proposed under this policy where this is required to make the scheme viable. Robust proof will be required to ensure that the level of market housing is the minimum required in viability terms to deliver the 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.



Delivery Policy HC4 - Local housing need (exception sites)		
	<p>affordable housing, including consideration of whether Government grant availability could reduce or negate the necessity for market housing. The inclusion of some market housing for cross-subsidy will not apply to self-build or custom-build affordable homes.</p>	
	<ul style="list-style-type: none"> 4.46 Rural exception sites should only be used for affordable housing in perpetuity. This policy seeks to address the needs of the local community by accommodating households who have a strong local connection either by current or recent past residency or via an existing family or employment connection. Preference will be given to those with a strong local connection to the parish, followed by those with a strong local connection to the adjoining parishes, then to the Stroud District as a whole. A Local Housing Needs Survey (LHNS) produced either by the Parish Council or by a housing provider using a methodology agreed by the District Council provides evidence of the extent and nature of local housing need for affordable housing sites. For single self-build and custom-build affordable projects the applicants will need to provide evidence of their need for such a plot by providing information on income and local connection. Entry-level exception sites must meet a proven unmet need for first time buyer or renter properties. Or suggest that the evidence should be requested as a pre-occupation or build-out condition. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
	<ul style="list-style-type: none"> 4.47 7 National policy suggests that local planning authorities should consider whether allowing some market housing on affordable housing exception sites would facilitate the provision of significant additional affordable housing to meet local needs. In response, 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>



Delivery Policy HC4 - Local housing need (exception sites)		
	<p>the Council will consider proposals where a majority of affordable homes are cross-subsidised by the provision of a minority of market housing, subject to the production of a detailed viability study demonstrating the requirement for this cross subsidy. Although the policy would not preclude any developer carrying out a suitable scheme with appropriate covenants on the land or legal agreements, the Council will require the properties to be managed by a Registered Provider.</p>	
SF Planning Limited (642)	<ul style="list-style-type: none"> Having two policies, HC3 and HC4, relating to self-build and custom build housing is confusing. 	The two policy approach is intended to provide clarity in terms of the different treatment of exceptions schemes.
	<ul style="list-style-type: none"> HC4 Criteria 6 – Question policy threshold of maximum GIA of 100m², not mentioned in national guidance. 	This threshold is intended to preserve affordability.
Policy wording modifications: None		
Wotton Under Edge Town Council (696)	<ul style="list-style-type: none"> Any development outside but adjoining SDL must take into account impact on the landscape value, including impact on the AONB: <ul style="list-style-type: none"> This requirement should be added to the list of criteria and be given priority. Policies for protection of the AONB (ES7) and environment (CP15) should explicitly take precedence when considering proposals outside but adjoining SDL. 	Landscape and the impact on the AONB is a material consideration. Other policies in the Plan, for example policies CP15, HC1 and ES7 deal with this issue.
	Policy wording modifications: None	
Comment		
Pegasus Group for Robert Hitchins Ltd (879)	<ul style="list-style-type: none"> A 'catch all' policy for both Rural Exception Sites and Entry Level Exception Sites is inappropriate: <ul style="list-style-type: none"> NPPF requirements are different Requires two separate policies or two clear sections in one policy. 	Comment noted but the Council does not agree that two policies are required. Policy HC4 read in conjunction with the NPPF provides sufficient policy guidance.
	Policy wording modifications	



Delivery Policy HC4 - Local housing need (exception sites)		
	<ul style="list-style-type: none"> • Potential amendments to Policy HC4: Planning permission may be granted for affordable housing, including entry level homes, and single plot self-build or custom build affordable dwellings on sites well related to existing settlements. Such sites should be located close to, or adjoining, an accessible settlement with local facilities ('Third Tier') or above in terms of the Plan settlement hierarchy, unless specific local need and environmental considerations indicate that provision should be met at fourth tier settlements. The Council shall meet local affordable housing need, where: <ol style="list-style-type: none"> 1. the Council is satisfied that there is a clearly evidenced local need, which cannot be readily met elsewhere in the locality, for the number and type of housing proposed. Occupants will be required to evidence their need for affordable housing and their connection to the relevant parish. 2. the site is accessible to a range of local services, such as shops, primary schools, healthcare and public transport 3. appropriate legal agreements are entered into to ensure that such dwellings will remain available as affordable housing for local need in perpetuity, with the necessary management of the scheme in place 4. the proposal satisfies the detailed criteria defined for meeting housing need at settlements 5. the design quality and gross internal floor area of affordable dwellings shall comply with the latest recommended standards used by Homes England where applicable. 6. Single plot self-build or custom-build affordable dwellings shall be limited to a maximum GIA of 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>



Delivery Policy HC4 - Local housing need (exception sites)		
	<p>100m2. Permitted development rights will be removed from these properties to prevent this maximum being breached.</p> <p>The Council will consider the inclusion of some market housing on affordable housing sites proposed under this policy where this is required to make the scheme viable. Robust proof will be required to ensure that the level of market housing is the minimum required in viability terms to deliver the affordable housing, including consideration of whether Government grant availability could reduce or negate the necessity for market housing. The inclusion of some market housing for cross-subsidy will not apply to self-build or custom build affordable homes.</p>	
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> • Criterion 6 limits the size of single-plot self or custom build affordable dwellings to 100sqm: <ul style="list-style-type: none"> ○ Prevents larger families in need of an affordable dwelling being able to build to the minimum gross internal floor areas set out in the Nationally Described Space Standard for Housing (2015). ○ Unclear justification for restriction 	This threshold is intended to preserve affordability by preventing the over-extension of the property.
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		



Core Policy DHC3 - Live-work development				
Number of representations: 7		Support: 6	Object: 1	Comment: 0
Stakeholders	Comments		Stroud District Council Response	
Support				
Gladman Developments Ltd (905)	<ul style="list-style-type: none"> Responds to national policy encouragement of flexible working practises, such as the integration of residential and commercial uses within the same unit. 		Comment noted.	
	<ul style="list-style-type: none"> Positive policy approach to live-work development. 		Comment noted.	
Policy wording modifications: None				
RPS Group for Stroud Corporation NV (917)	<ul style="list-style-type: none"> Welcome policy approach and support for flexible forms of accommodation with employment use. 		Comment noted.	
	Policy wording modifications: None			
Savills (UK) Limited for Coln Residential (934)	<ul style="list-style-type: none"> Support the principle of having an independent policy for live work units. 		Comment noted.	
	Policy wording modifications: None			
Object				
Wotton Under Edge Town Council (696)	<ul style="list-style-type: none"> Any development outside but adjoining SDL must take into account impact on the landscape value, including impact on the AONB: <ul style="list-style-type: none"> This requirement should be added to the list of criteria and be given priority. Policies for protection of the AONB (ES7) and environment (CP15) should explicitly take precedence when considering proposals outside but adjoining SDL. 		Any proposed live-work development located outside but adjoining settlement development limits will also need to satisfy the policy requirements of Core Policy CP15 A quality living and working countryside for appropriate exceptional development together with Delivery Policy HC1 Detailed criteria for new housing developments and Delivery Policy ES7 Landscape character, prioritising the conservation and enhancement of the natural and special qualities of the Cotswolds Area of Outstanding Natural Beauty (AONB).	
	Policy wording modifications: None			
Comment				
No comments received				
	Policy wording modifications: None			

Core Policy DHC3 - Live-work development		
Other representations	Issues raised	Stroud District Council Response
214	<ul style="list-style-type: none"> There is a need for mortgages to be provided for these properties. There is no tailor made mortgage product available - at present. 	Comment noted.
Policy wording modifications: None		



Delivery Policy HC1 - Detailed criteria for new housing developments				
Number of representations: 9		Support: 2	Object: 4	Comment: 3
Stakeholders	Comments		Stroud District Council Response	
Support				
Sport England (133)	<ul style="list-style-type: none"> Encourage the adoption of Sport England's Active Design as a base line for new housing developments. 		Supported noted. Whilst Sport England's Active Design guidance is a source of good practice, Policy HC1 does not seek to prescribe particular standards, or best practice which may evolve over time. However, the policy does set out principles which reflect the NPPF and good practice.	
Policy wording modifications: None				
Blue Fox Planning Ltd for Persimmon Homes Severn Valley (928)	<ul style="list-style-type: none"> Support the principle of a criteria based approach. Criteria 4 should set out how open space is determined to be important to the character of a settlement. Criteria 5 lacks clarity how habitats will be determined as 'locally valued'. <ul style="list-style-type: none"> Should be based on established survey techniques for sites of known ecological constraints. Criteria 6 lacks clarity as to what constitutes features that are 'worthy' of retention and by whom. 		<p>Support noted.</p> <p>Paragraph 4.54 refers to a range of published documents, including neighbourhood plans, community or parish design statements and national best practice guidance, which should be taken into account when designing developments to ensure that local characteristics (including open space) are enhanced and local distinctiveness promoted through design.</p> <p>Paragraph 179 of the NPPF sets out that local wildlife rich habitats should be safeguarded. This is reflected in the identified priority issues set out in the SDLP (page 12). Specific sites include those sites identified in Policy ES6 but the onus should be upon developers to demonstrate through ecological surveys that no harm is being caused to sites for nature conservation, protected species, or species or habitats of importance.</p> <p>The variety of local features is too varied to be able to capture these all within the policy, or supporting text, but the delivery of this criteria would follow national and local policy as set out in the NPPF and other policies of the SDLP relating to the natural and built environment.</p>	
Policy wording modifications: None				
Object				
Wotton Under Edge Town Council (696)	<ul style="list-style-type: none"> Appears to contradict policies HC3, HC4 and DHC3 by allowing general (rather than "exceptional") development on adjacent to SDL locations. 		The policy does not contradict other policies as it provides universal design criteria for sites wherever they are located. The policy says at the beginning that it applies to sites "within settlement development limits, and other limited housing development specifically allowed for by other policies in the Plan at locations outside of settlement development limits". Policies HC3, HC4 and DHC3 are examples of policies which do provide for limited housing	



Delivery Policy HC1 - Detailed criteria for new housing developments		
		development outside of settlement development limits.
	Policy wording modifications: None	
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> Criteria 4 is too broadly defined. <ul style="list-style-type: none"> Impact on allocations Evidence to ensure allocations affected by PROWs are protected against conflicts with this part of the Policy. 	The key point here relates to open space or PROW considered important to the character of the settlement, which will narrow the focus down considerably in practice. The criteria is also not a blanket ban, but includes a weighing up of the benefits and harm.
	<ul style="list-style-type: none"> Areas of important open space should be protected/recognised through the Council’s Green Infrastructure, Sport and Recreation Study, referred to in Policy DHC6. 	Most significant areas of open space have been identified in the Council’s Green Infrastructure, Sport and Recreation Study and are protected under Policy DHC6. However, smaller areas of open space and landscaping, particularly those which are not in primary use as formal play space or part of public parks or sports facilities, may not have been surveyed but may still be important to the character of a settlement.
	Policy wording modifications: None	
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> Criteria 4 is too broadly defined. <ul style="list-style-type: none"> Impact on allocations Evidence to ensure allocations affected by PROWs are protected against conflicts with this part of the Policy. 	The key point here relates to open space or PROW considered important to the character of the settlement, which will narrow the focus down considerably in practice. The criteria is also not a blanket ban, but includes a weighing up of the benefits and harm.
	<ul style="list-style-type: none"> Areas of important open space should be protected/recognised through the Council’s Green Infrastructure, Sport and Recreation Study, referred to in Policy DHC6. 	Most significant areas of open space have been identified in the Council’s Green Infrastructure, Sport and Recreation Study and are protected under Policy DHC6. However, smaller areas of open space and landscaping, particularly those which are not in primary use as formal play space or part of public parks or sports facilities, may not have been surveyed but may still be important to the character of a settlement.
	Policy wording modifications: None	
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> Criteria 4 is too broadly defined. <ul style="list-style-type: none"> Impact on allocations Evidence to ensure allocations affected by PROWs are protected against conflicts with this part of the Policy. 	The key point here relates to open space or PROW considered important to the character of the settlement, which will narrow the focus down considerably in practice. The criteria is also not a blanket ban, but includes a weighing up of the benefits and harm.
	<ul style="list-style-type: none"> Areas of important open space should be protected/recognised through the Council’s Green 	Most significant areas of open space have been identified in the Council’s Green Infrastructure, Sport and Recreation Study and are protected under



Delivery Policy HC1 - Detailed criteria for new housing developments		
	<p>Infrastructure, Sport and Recreation Study, referred to in Policy DHC6.</p> <ul style="list-style-type: none"> The Residential Design Guide November 2000 is out of date and no longer fit for purpose and should have no role in assisting the Council in making decisions in accordance with Policy HC1. 	<p>Policy DHC6. However, smaller areas of open space and landscaping, particularly those which are not in primary use as formal play space or part of public parks or sports facilities, may not have been surveyed but may still be important to the character of a settlement.</p> <p>The supporting text makes clear that the Residential Design Guide will be reviewed to provide an up-to-date SPD – identifying therefore that the current document is out of date.</p>
Policy wording modifications: None		
Comment		
Savills (UK) Limited for The Berkeley Estate (878)	<ul style="list-style-type: none"> Criteria 3 ‘intrusion into the countryside’ is subject to wide variation in interpretation and can be positively addressed through good design and landscaping. Criteria 4 should not prohibit the loss of, or damage to, public rights of way (PROWs), as many new developments necessitate the reconfiguration of PROWs as part of their master planning strategy. 	<p>It is agreed that good design and landscaping can be an effective solution to such matters. However, it is legitimate to raise the issue as one which needs to be addressed through the planning process.</p> <p>The key point here relates to PROW considered important to the character of the settlement, which will narrow the focus down considerably in practice. The criteria is also not a blanket ban, but includes a weighing up of the benefits and harm.</p>
Policy wording modifications: None		
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> Policy criteria 3, 5 and 8 are open to interpretation and should be better defined or cross referenced to relevant policies elsewhere in the eSDLP or NPPF 2019. 	<p>The criteria are considered to be clear about the issues to be addressed and the objectives to be achieved, whilst acknowledging that many detailed design considerations on a site by site basis cannot be prescribed through general criteria.</p>
Policy wording modifications: None		
Savills (UK) Limited for Coln Residential (934)	<ul style="list-style-type: none"> Policy wording “Housing Development within settlement development limits, and other limited housing development specifically allowed for by other policies in the Plan at locations outside of the settlement limits” could be simplified. Criteria 3 ‘intrusion into the countryside’ is subject to wide variation in interpretation and can be positively addressed through good design and landscaping. 	<p>Given the complexity of the issue and the importance of the information that this conveys, it is more important that this is clear and unambiguous rather than simplified.</p> <p>It is agreed that good design and landscaping can be an effective solution to such matters. However, it is legitimate to raise the issue as one which needs to be addressed through the planning process.</p>
Policy wording modifications: None		



Delivery Policy HC1 - Detailed criteria for new housing developments		
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		



Delivery Policy DHC4 - Community-led housing				
Number of representations: 3		Support: 2	Object: 1	Comment: 0
Stakeholders	Comments		Stroud District Council Response	
Support				
Tetlow King Planning for South West Housing Association Planning Consortium (HAPC) (885)	<ul style="list-style-type: none"> Support the development of housing schemes that are initiated by local communities. 		Support noted.	
	<ul style="list-style-type: none"> Highlight the successful proven track record that Community Land Trusts (CLTs) have in delivering affordable housing for local people, particularly in rural areas. <ul style="list-style-type: none"> SW HAPC housing associations have delivered significant levels of affordable housing through partnerships with CLTs across the south of England. 		The Council supports the delivery of housing through CLTs and through community orders and this policy is intended to positively support delivery vehicles which achieve the shared vision of communities (NPPF para. 29, para. 52).	
Policy wording modifications: None				
Object				
Gladman Developments Ltd (905)	<ul style="list-style-type: none"> Not included within adopted Local Plan. 		Comment noted.	
	<ul style="list-style-type: none"> Principle of development should be based on the sustainability of a site and appropriate development. <ul style="list-style-type: none"> Community group promotion irrelevant. Should not warrant preferential support. 		The Council supports the delivery of housing through CLTs and through community orders and this policy is intended to positively support delivery vehicles which achieve the shared vision of communities (NPPF para. 29, para. 52). The policy does not give preferential support.	
Policy wording modifications: None				
Comment				
No comments received				
Policy wording modifications: None				
Other representations	Issues raised		Stroud District Council Response	
No comments received				
Policy wording modifications: None				

HC5

Delivery Policy HC5 - Replacement dwellings			
Number of representations: 2		Support: 2	
Object: 0		Comment: 0	
Stakeholders	Comments	Stroud District Council Response	
Support			
No comments received	Policy wording modifications: None		
Object			
No comments received	Policy wording modifications: None		
Comment			
No comments received	Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response	
No comments received			
Policy wording modifications: None			



Delivery Policy HC6 - Residential sub-division of dwellings			
Number of representations: 1	Support: 1	Object: 0	Comment: 0
Stakeholders	Comments	Stroud District Council Response	
Support			
Cotswold Land & Property Ltd (170)	<ul style="list-style-type: none"> The policy should be widened to include the change of use and sub-division of commercial buildings where those commercial buildings are deemed unviable for commercial/community purposes. 	Where planning permission is required, delivery policies E17 Primary Shopping Areas and E18 Town centres provide support for wider residential use within town centres, including on upper floors in designated Primary Shopping Areas. Outside defined retail and town centre boundaries, Delivery Policy E16 sets out criteria for supporting the change of use involving a loss of commercial and community facilities and services, including where the current or previous use is demonstrated as no longer viable.	
	<ul style="list-style-type: none"> The policy should be widened to include conversion to HMO bedrooms as distinct from self-contained units. 	Where planning permission is required, Delivery Policy HC2 Providing new homes above shops in our town centres supports the provision of a greater variety of residential accommodation with improved living conditions, close to facilities and public transport links.	
Policy wording modifications: None			
Object			
No comments received	Policy wording modifications: None		
Comment			
No comments received	Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response	
No comments received			
Policy wording modifications: None			

HC7

Delivery Policy HC7 - Annexes for dependents or carers			
Number of representations: 1		Support: 1	
Object: 0		Comment: 0	
Stakeholders	Comments	Stroud District Council Response	
Support			
No comments received			
Policy wording modifications: None			
Object			
No comments received			
Policy wording modifications: None			
Comment			
No comments received			
Policy wording modifications: None			
Other representations	Issues raised	Stroud District Council Response	
No comments received			
Policy wording modifications: None			



HC8

Delivery Policy HC8 - Extensions to dwellings			
Number of representations: 1		Support: 1	
Object: 0		Comment: 0	
Stakeholders	Comments	Stroud District Council Response	
Support			
No comments received	Policy wording modifications: None		
Object			
No comments received	Policy wording modifications: None		
Comment			
No comments received	Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response	
No comments received	Policy wording modifications: None		



Delivery Policy DHC5 - Wellbeing and healthy communities				
Number of representations: 5		Support: 4	Object: 1	Comment: 0
Stakeholders	Comments		Stroud District Council Response	
Support				
Sport England (133)	<ul style="list-style-type: none"> Encourage the adoption of Sport England's Active Design guidance as a base line for new housing developments: 		Supported noted. Whilst Sport England's Active Design guidance is a source of good practice, Policy DHC5 does not seek to prescribe particular standards, or best practice which may evolve over time. However, the policy does set out principles which reflect the NPPF and good practice.	
Policy wording modifications: None				
Natural England (864)	<ul style="list-style-type: none"> Welcome policy in the context of emerging 'social prescribing' across the 7 NHS regions in England. 		Support noted	
	<ul style="list-style-type: none"> Future NE/ NHS joint work programme objective to embed the natural environment as a mainstream offer to address current health challenges and inequalities. 		Comment noted	
Policy wording modifications: None				
Object				
The Planning Bureau Ltd for McCarthy and Stone Retirement Lifestyles Ltd (675)	<ul style="list-style-type: none"> Welcome Council's commitment to the health and wellbeing of its residents, including an increasing ageing demographic profile over the Plan period. 		Support noted	
	<ul style="list-style-type: none"> Increasing the delivery of specialist older persons' housing, enabling independent living, is wholly aligned with the objective of improving the health and wellbeing of residents. 		Comment noted	
	<ul style="list-style-type: none"> The role of specialist older persons' housing in improving the health and wellbeing of the District's elderly residents should be acknowledged in the supporting text of the policy. 		New Core Policy DCP2 Supporting Older People and People with Mobility Issues and its supporting text set out the Council's commitment to providing specialist older person housing and other initiatives and developments of benefit to the health and wellbeing of an ageing population. The SDLP should be read as a whole and there is no need for policy cross-referencing of this nature.	
Policy wording modifications: None				



Delivery Policy DHC5 - Wellbeing and healthy communities		
Comment		
No comments received		
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		



Delivery Policy DHC6 - Protection of existing open spaces and built and indoor sports facilities				
Number of representations: 7		Support: 6	Object: 1	Comment: 0
Stakeholders	Comments		Stroud District Council Response	
Support				
Sport England (133)	<ul style="list-style-type: none"> Sport England supports this policy as it is based on the NPPF guidance and has sound assessments. 		Support noted	
Policy wording modifications: None				
Natural England (864)	<ul style="list-style-type: none"> Welcome these new policies and note paragraph 4.89 on producing a Supplementary Planning Document to provide information on how policies for protecting and enhancing existing open space and recreation provision and for the provision of new facilities will be implemented. Natural England is leading the Green Infrastructure Standards project; to deliver the 25 Year Environment Plan. Research within the project has identified key benchmarks that are informing the update of Accessible Natural Greenspace Standards. Also developing the first official England-wide map of GI. The new standards are programmed for a launch in the Summer next year and look forward to working with the Council to contribute to the proposed SPD. 		Support and comment noted.	
Policy wording modifications: None				
Object				
Wotton Under Edge Town Council (696)	<ul style="list-style-type: none"> The affected community should have a say in whether open space/sports facilities might be available for development even if a surplus in the catchment area has been identified. This should not be based solely on a developer's assessment. 		This will be addressed at the planning application stage with opportunities for the Town Council, Ward Member and Public to represent community interests and/or rebut any evidence accompanying an application. It is interesting to note in the evidence base document EB41a that Table 20 Supply by Parish (hectares) against the Stroud quantity standards shows shortfalls across a range of formal recreation facilities for WuE.	
Policy wording modifications: None				
Comment				
No comments received				
Policy wording modifications: None				



Delivery Policy DHC6 - Protection of existing open spaces and built and indoor sports facilities		
Other representations	Issues raised	Stroud District Council Response
Policy application confusion.		
214	<ul style="list-style-type: none"> Confused by SDC approach on Brimscombe Port? Seems like a precedent contrary to this Policy. 	The use of old industrial units for indoor sporting facilities at Brimscombe Port was on the understanding that the uses would be temporary.
625	<ul style="list-style-type: none"> Confused as to whether this applies to open spaces next to AONB's, but would request an extension to the AONB to include 'land within the setting of an AONB, namely the Slad Valley. 	Open Space is defined as all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Evidence Base Document EB41a provides robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses). Existing open space, sports and recreational buildings and land, including playing fields, should not be built on. Planning policies and decisions should protect and enhance public rights of way and access. Policy ES7 Landscape Character also provides protection for any setting land adjoining the AONB.
Support the policy principles		
405	<ul style="list-style-type: none"> Support the principles which is why it is so important to object to the huge building plans. 	Comment noted
Policy wording modifications: None		





Delivery Policy DHC7 - Provision of new open space and built and indoor sports facilities		
Number of representations: 12	Support: 2	Object: 3
Stakeholders	Comments	Stroud District Council Response
Support		
No comments received	Policy wording modifications: None	
Object		
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> Objects to the policy because it is not consistent with national guidance. The policy requires 3.92 ha of open space per 1000 population. Paragraph 96 requires that policies should be based on robust and up-to-date assessments of the need for facilities. Those assessments should then be used to determine what are the open space requirements arising from development. The Policy sets out an open space and sport requirement based in part on historic standards (e.g., Fields in Trust) or seeks to apply standards, there are no nationally recognised standards (e.g., orchards). In seeking to set out a typology of recreation contributions, the concern is that the Policy will be used to secure contributions towards open space/recreation facilities in locations which are not relevant to the proposals. In addition, the reliance on supplementary planning document is unhelpful as it could introduce additional requirements to the Policy. 	<p>The Council considers the assessment is robust and sound. The work is in accordance with NPPF Paragraph 98. The work was undertaken using best practice and compiled locally derived standards. The Council used these 2019 locally derived standards to both guide development and help inform Council thinking in relation to policy development. The Council will keep these standards and facilities provision under review over the Plan period. The Open Space; GI and Recreation Studies, indoor Sports Facilities Assessment and Playing Pitch Strategy Reports (EB41, EB41a-j, EB42, EB43 and EB43a-s) all provide recommendations for new and improved provision, on a Districtwide, and local cluster basis respectively. The study work was informed by associated community and stakeholder consultation. Appropriate, outline standards of provision help guide provision in relation to new housing with respect to Section 106 contributions and the Community Infrastructure Levy (CIL). The studies also support the Council in making grant bids or securing other funding sources.</p>
	Policy wording modifications: None	
McLoughlin Planning for SevenHomes (839)	<ul style="list-style-type: none"> Objects to the Policy because it is not consistent with national guidance. The Policy requires 3.92 ha of open space per 1,000 population. Paragraph 96 requires that policies should be based on robust and up-to-date assessments of the need for facilities. Those assessments should then be used to determine what 	<p>The Council considers the assessment is robust and sound. The work is in accordance with NPPF Paragraph 98. The work was undertaken using best practice and compiled locally derived standards. The Council used these 2019 locally derived standards to both guide development and help inform Council thinking in relation to policy development. The Council will keep these standards and facilities provision under review over the Plan period.</p>



Delivery Policy DHC7 - Provision of new open space and built and indoor sports facilities		
	<p>are the open space requirements arising from development. As the Policy sets out an open space and sport requirement based in part on historic standards (e.g., Fields in Trust) or seeks to apply standards, there are no nationally recognised standards (e.g., orchards). In seeking to set out a typology of recreation contributions, the concern is that the Policy will be used to secure contributions towards open space/recreation facilities in locations which are not relevant to the proposals. In addition, the reliance on supplementary planning document is unhelpful as it could introduce additional requirements to the Policy.</p>	<p>The Open Space; GI and Recreation Studies, indoor Sports Facilities Assessment and Playing Pitch Strategy Reports (EB41, EB41a-j, EB42, EB43 and EB43a-s) all provide recommendations for new and improved provision, on a Districtwide, and local cluster basis respectively. The study work was informed by associated community and stakeholder consultation. Appropriate, outline standards of provision help guide provision in relation to new housing with respect to Section 106 contributions and the Community Infrastructure Levy (CIL). The studies also support the Council in making grant bids or securing other funding sources.</p>
<p>Policy wording modifications: None</p>		
<p>Sport England (133)</p>	<ul style="list-style-type: none"> Object to the use of standards for new sports provision as it is contrary to paragraph 96 of the NPPF. New sports provision should be based on guidance set out in the playing pitch strategy and built facilities assessment. However the BFA is based in part of outdate methodology and lacks a robust evidence base and should have the Facilities Planning Model to help inform the conclusions of the assessment. 	<p>The Council considers the assessment is robust and sound. The work is in accordance with NPPF Paragraph 98. The work was undertaken using best practice and compiled locally derived standards. The Council used these 2019 locally derived standards to both guide development and help inform Council thinking in relation to policy development. The Council will keep these standards and facilities provision under review over the Plan period. The Open Space; GI and Recreation Studies, indoor Sports Facilities Assessment and Playing Pitch Strategy Reports (EB41, EB41a-j, EB42, EB43 and EB43a-s) all provide recommendations for new and improved provision, on a Districtwide, and local cluster basis respectively. The study work was informed by the associated community and stakeholder consultation. Appropriate, outline standards of provision help guide provision in relation to new housing with respect to Section 106 contributions and the Community Infrastructure Levy (CIL). The studies also support the Council in making grant bids or securing other funding sources. Further dialogue is welcomed with Sport England on implementation of the Playing Pitch Strategy and Built Facilities Assessment/Facilities Planning Model.</p>
<p>Policy wording modifications: None</p>		



Delivery Policy DHC7 - Provision of new open space and built and indoor sports facilities		
Comment		
Savills UK Limited for The Berkeley Estate (878)	<ul style="list-style-type: none"> Some of the open space typologies presented in Policy DHC7 could be considered to overlap. The policy does not clarify where the distinction arises between 'Amenity Green Space', 'Parks and Recreation Grounds' and 'Natural Green Space', which can all have common characteristics. The number of typologies presented in this policy could cause significant confusion for developers. Such requirements will also need to be part of viability appraisals for strategic schemes when establishing what contributions the development can support. 	<p>Comment noted. Necessary infrastructure will be secured in accordance with Core Policy CP6. On-site provision to be incorporated within the overall design scheme; where off-site provision is required, developer contributions can be secured through appropriate planning obligations to mitigate any adverse impacts. In determining the nature and scale of any provision, the Council will have regard to viability considerations and site specific circumstances. Viability assessment should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p>
Policy wording modifications: None		
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> The delivery mechanisms suggested in the policy could lead to a lack of clarity for applicants and developers being less clear about whether aspects are addressed through S106 or a CIL tariff? If provision is on site, it would result in double counting if a developer were to also make a fixed CIL payment that covered off-site provision. It is suggested that larger, strategic-scale facilities such as indoor swimming pools, sports halls and health and fitness suites may be best addressed through CIL and the remainder are either provided on site or contributions sought through S106 obligations. The approach would provide a more effective policy framework. 	<p>Comment noted. Necessary infrastructure will be secured in accordance with Core Policy CP6. In determining the nature and scale of any provision, the Council will have regard to viability considerations and site specific circumstances. Viability assessment should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p>
Policy wording modifications: None		
Rapleys LLP for Crest Nicholson Land and Partnerships (897)	<ul style="list-style-type: none"> If the Council intends to operate a CIL the provision of indoor sports facilities should more appropriately be covered by the levy, than by on-site provision or S106 contributions. To illustrate, a 25m swimming pool has an area of 300 sqm; which would necessitate a 30,800 person increase in population, equivalent to the 	<p>Comment noted. Necessary infrastructure will be secured in accordance with Core Policy CP6. In determining the nature and scale of any provision, the Council will have regard to viability considerations and site specific circumstances. Viability assessment should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. Ahead of the EIP, the Council is</p>



Delivery Policy DHC7 - Provision of new open space and built and indoor sports facilities		
	<p>delivery of over 13,000 houses (based on average household size in Stroud), which is more than is planned for during the whole of the Plan period.</p>	<p>updating its viability evidence base and documentation. This will be published in due course.</p>
	<p>Policy wording modifications:</p>	
	<ul style="list-style-type: none"> Indoor sports facilities, by their nature, cater for much wider catchments and therefore it is appropriate that their provision should be covered via CIL. This aspect of the policy is not effective and should be amended. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
Savills for L&Q Estates (913)	<ul style="list-style-type: none"> It is helpful that the Draft Plan sets out standards which can then be used in the masterplanning of residential development proposals. Do have a number of concerns with the proposed approach in the policy. There are a total of eight different open space typologies, each with individual standards. Whilst some of these are clearly distinctive, such allotments and children’s play provision, there are others which conceivably overlap. The Open Space, Green Infrastructure, Sport and Recreation Study (2019) clearly identifies duplication of the Parks and Recreation provision which it states should include at least two facilities for example pitches/courts and childrens play space; and later confirms that this can include publically accessible sports pitches (p68). In reviewing the Playing Pitch Strategy (2019), it is not possible to identify where the separate requirement for a further 0.7ha of playing pitch provision is justified. 	<p>Comment noted. Necessary infrastructure will be secured in accordance with Core Policy CP6. In determining the nature and scale of any provision, the Council will have regard to viability considerations and site specific circumstances. Viability assessment should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p> <p>The Open Space; GI and Recreation Studies, indoor Sports Facilities Assessment and Playing Pitch Strategy Reports (EB41, EB41a-j, EB42, EB43 and EB43a-s) all provide recommendations for new and improved provision, on a Districtwide, and local cluster basis respectively. The study work was informed by the associated community and stakeholder consultation. Appropriate, outline standards of provision help guide provision in relation to new housing with respect to Section 106 contributions and the Community Infrastructure Levy (CIL). The studies also support the Council in making grant bids or securing other funding sources.</p>
	<ul style="list-style-type: none"> Planning obligations can only be used to secure land uses or financial obligations where they meet the statutory tests. The first of these tests is that they are “necessary to make the development acceptable in planning terms”. It is only necessary to provide new open space where the development proposed would create a deficit in provision which needs to be 	<p>The Council will follow the necessary tests for planning obligations. Necessary infrastructure will be secured in accordance with Core Policy CP6. In determining the nature and scale of any provision, the Council will have regard to viability considerations and site specific circumstances. Viability assessment should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. Ahead of the EIP, the Council is updating its viability evidence</p>



Delivery Policy DHC7 - Provision of new open space and built and indoor sports facilities		
	<p>remedied through the application proposals. The final paragraph of the Policy is in conflict with the statutory tests and should be changed to make it clear that provision will only be sought where there is a deficit within the local area for that typology; there is no need to interchange the requirement where there is an overprovision in one category and under provision in another.</p>	<p>base and documentation. This will be published in due course.</p>
	<ul style="list-style-type: none"> In addition to the eight open space typologies, there are a further four standards for built recreation facilities. These are precisely the type of facilities which should be provided through CIL contributions where a demand exists. Facilities such as swimming pools and health & fitness studios are also typically provided by the private sector where market demand exists, and it is not the role of the development industry to support these. It is not therefore necessary for the local authority to seek to provide these or to take contributions towards provision. 	<p>In determining the nature and scale of any provision, the Council will have regard to viability considerations and site specific circumstances. Viability assessment should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p>
	<p>Policy wording modifications:</p>	
	<ul style="list-style-type: none"> Indoor sports facilities, by their nature, cater for much wider catchments and therefore it is appropriate that their provision should be covered via CIL. This aspect of the policy is not effective and should be amended. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
<p>Savills UK Limited for Coln Residential (934)</p>	<ul style="list-style-type: none"> Some of the open space typologies presented in Policy DHC7 could be considered to overlap. The policy does not clarify where the distinction arises between 'Amenity Green Space', 'Parks and Recreation Grounds' and 'Natural Green Space', which can all have common characteristics. The number of typologies presented in this policy could cause significant confusion for developers. Such requirements will also need to be factored into viability appraisals for strategic schemes 	<p>In determining the nature and scale of any provision, the Council will have regard to viability considerations and site specific circumstances. Viability assessment should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p>



Delivery Policy DHC7 - Provision of new open space and built and indoor sports facilities		
	when establishing what contributions the development can support.	
Policy wording modifications: None		
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> Terra objects to the policy because it is not consistent with national guidance. The policy requires 3.92 ha of open space per 1000 population. Paragraph 96 requires that policies should be based on robust and up-to-date assessments of the need for facilities. Those assessments should then be used to determine what are the open space requirements arising from development. In seeking to set out a typology of recreation contributions, the concern is that the Policy will be used to secure contributions towards open space/recreation facilities in locations which are not relevant to the proposals. In addition, the reliance on supplementary planning document is unhelpful as it could introduce additional requirements to the Policy. 	In determining the nature and scale of any provision, the Council will have regard to viability considerations and site specific circumstances. Viability assessment should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
Policy wording modifications: None		
Blue Fox Planning Ltd for Persimmon Homes Severn Valley (928)	<ul style="list-style-type: none"> This new policy introduces open space, recreation standards from which new development will be required to provide in a manner which is proportionate to the scale of development. The capacity of an individual site to accommodate open space provision as listed within DHC7 will be dependent upon the scale of the development proposed. It is noted that DHC7 recognises that where the achievement of these standards is unrealistic or inappropriate within the boundaries of the site, a financial contribution will be secured through a legal agreement or Community Infrastructure Levy (CIL). It is unclear how site-specific financial contributions, secured through S106 obligations and/or the CIL are distinguishable in this context. The concern being that there could be 	<p>Comment noted. Necessary infrastructure will be secured in accordance with Core Policy CP6. In determining the nature and scale of any provision, the Council will have regard to viability considerations and site specific circumstances. Viability assessment should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p> <p>Other comments are noted.</p>



Delivery Policy DHC7 - Provision of new open space and built and indoor sports facilities		
	<p>double payments in circumstances where developments are liable for the CIL levy alongside specific open space/sports requirements secured through the S106 process. Greater clarity is required to demonstrate how this approach is justified and the precise mechanism through which off- site contributions will be secured. It is also unclear as to whether an individual development will be required to make financial contributions towards all the different types of open space and built facilities, irrespective the mechanism for securing any such contributions.</p> <ul style="list-style-type: none"> • The final paragraph of DHC7 confirms that in circumstances where a significant surplus in the local area, the requirements could be varied in order to provide another form of open space to help address a deficiency in an existing provision. Whilst this represents a pragmatic approach, any such provision must continue to be proportionate to the scale of development proposed. Paragraph 4.89 explains that the Council will produce a Supplementary Planning Document to provide information on how policies will be implemented. Any future Supplementary Planning Document should not introduce additional policy burdens which should normally be presented and examined as part of the Local Plan process. 	
Policy wording modifications:		
	<ul style="list-style-type: none"> • To ensure that the delivery of open space/sports provision is both justified and effective it is considered necessary to provide greater clarity in terms of how any off-site contributions will be secured and to provide a clear distinction between site specific agreements to and the application of CIL in the delivery of this provision. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>



Delivery Policy DHC7 - Provision of new open space and built and indoor sports facilities		
Other representations	Issues raised	Stroud District Council Response
New Open Spaces		
405	<ul style="list-style-type: none"> Support new open spaces. 	Support noted.
Policy wording modifications: None		



Core Policy CP11 - New employment development				
Number of representations: 7		Support: 4	Object: 2	Comment: 1
Stakeholders	Comments		Stroud District Council Response	
Support				
Rubhicon Planning Ltd for Tritax Symmetry Gloucester Ltd (609)	<ul style="list-style-type: none"> The definition of industrial symbiosis needs to be revisited looking at the wider connections of industries which are mutually beneficial. 		Comment noted.	
	Policy wording modifications: None			
Pegasus Group for Robert Hitchins Ltd (879)	<ul style="list-style-type: none"> Strategic locations for growth should accord with this policy criteria 2. 		Comment noted.	
	<ul style="list-style-type: none"> The Employment Land Review (ELR) (March 2021) is positive towards land at Grove End Farm, Whitminster and recommends that the Council consider allocating Grove End Farm as part of its employment land supply. 		Whilst the Employment Land Review (EB30) recognised the site's employment potential, the site is not being promoted as a standalone employment site but as a potential growth point for up to 2,250 dwellings, employment, local centre, primary school, community facilities and open space. The SDLP Sustainability Appraisal demonstrates that other alternative strategic sites perform better at meeting the District's housing requirement.	
	<ul style="list-style-type: none"> Consideration should be given to how the employment needs are to be met having regard to the ELR's conclusions. 		The SDLP demonstrably meets identified local needs and reflects the aspirations of the Gloucestershire Industrial Strategy (EB27) and the conclusions of the Gloucestershire Economic Needs Assessment (EB29) and Stroud District Employment Land Review (EB30).	
Policy wording modifications: None				
Object				
Gloucestershire County Council (904)	<ul style="list-style-type: none"> Confirmation is required that future proposals for waste management- related infrastructure might reasonably be considered alongside traditional employment land use categories of business use, general industrial use and storage / distribution use and "Sui Generis" industrial uses, tourism, retailing, health care, education and leisure facilities. 		The Council has prepared a Statement of Common Ground with Gloucestershire County Council, which has acknowledged this objection and where "both parties are committed to working together to resolve this soundness matter and will continue dialogue accordingly." (Duty to Cooperate Statement (EB3)).	
	<ul style="list-style-type: none"> Would support Core Policy CP11 going forward if amendments made. 		Comment noted.	



Core Policy CP11 - New employment development		
	<p>Policy wording modifications:</p> <ul style="list-style-type: none"> Core Policy CP11 is not sound as it is not clear whether future proposals for waste management-related infrastructure could be afforded local policy support? National policy as set out under the National Planning Policy for Waste (NPPW) advises that priority for new or enhanced waste management facilities should be given to sites identified for employment uses alongside a number of other land-use types. There should be an additional bullet point; or slightly expanded text to bullet points 5 or 6; and / or a revision to the supporting text under paragraph 5.2. 	Further discussion with GCC required. All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Comment		
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> Compared to para. 81 of NPPF, paragraph 2 of CP11 does not sufficiently provide that flexibility. The pandemic has forced many changes in working practices and it is expected that many businesses will continue to promote agile and home working for example. This is supported by the growing market for mixed use employment hubs where housing, employment and recreation are provided within a walkable neighbourhood. 	CP11 responds to the NPPF paragraphs 80-83 by referring to allocating strategic sites, encouraging mixed use developments, expanding existing businesses, supporting rural diversification and recognising the locational requirements of different sectors.
	<ul style="list-style-type: none"> As currently worded paragraph 2 of CP11 is limited to 'safeguarding employment sites' unless employment is intensified, and this does not address the opportunity for mixed-use employment led schemes. 	Paragraph 2 of CP11 is not limited to safeguarding sites. It also refers to allocating sites for mixed use redevelopment. A range of employment delivery policies provide for flexibility and opportunities for existing business to expand.
	<p>Policy wording modifications:</p> <ul style="list-style-type: none"> Criterion d) of the NPPF should be incorporated into paragraph 2 of CP11. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.



Core Policy CP11 - New employment development		
Other representations	Issues raised	Stroud District Council Response
Site allocations		
214	<ul style="list-style-type: none"> The reality of allocations and protected employment sites is at variance to the reality eg. Daniels Industrial Estate and Bath Road Trading Estate. (not exhaustive). 	The Stroud District Employment Land Review (EB30) involved a survey of sites and stakeholder engagement carried out during early 2021. Whilst some changes may have occurred since survey work was undertaken, the broad conclusions of the ELR remain valid.
474	<ul style="list-style-type: none"> The provision of new employment for PS37 is very poor with the majority of any new residents having to travel to work. 	Topic Paper – Transport October 2021 (EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices.
Policy wording modifications: None		



Core Policy CP12 - Town centres and retailing				
Number of representations: 5		Support: 2	Object: 2	Comment: 1
Stakeholders	Comments		Stroud District Council Response	
Support				
No comments received	Policy wording modifications: None			
Object				
Wotton Under Edge Town Council (696)	<ul style="list-style-type: none"> The list of priorities for improving retail facilities in each of the towns, shown in the Table, Section A (Page 253) implies that Wotton is the lowest priority. This is not acceptable. All town centres are of equal importance. 		Local centres are listed alphabetically in the policy table. Suggested minor modification, for clarification, to list local centres alphabetically in Section A and to list Neighbourhood Shopping areas alphabetically in the policy table.	
Policy wording modifications: None				
SDC Cllr Haydn Jones (500)	<ul style="list-style-type: none"> PS36 Sharpness has been included on the basis of a restored passenger railway service being provided. There is no firm evidence that Network Rail have agreed, that funding is in place or it is a practical proposal. There is no documented commitment to provide and fund this essential infrastructure to secure a sustainable development in this location. Sustainability of PS36 has been optimistically based on significant internalisation of work, leisure and travel within the eventual settlement and reopening of Sharpness Rail Station and link to the mainline. The modelling suggested by the PS36 site promoters is wildly optimistic. PS37. Wisloe is an unsuitable site for development due to Agricultural Land Classification, Noise, Pollution, Ecology, Coalescence, HSE, Highways, Sustainable Transport, Sustainability Assessment, Footpaths/PROW, Flooding, minerals, Archaeology, Landscape and AONB. 		Comments not relevant to this policy.	



Core Policy CP12 - Town centres and retailing		
	<ul style="list-style-type: none"> The removal of site PS37 is required in order to make the Local Plan legally compliant and sound. PS37 should not form part of an appropriate strategy when considered against reasonable alternatives. Reduction in overall plan numbers required by applying 'buffer' to new sites only (see answer to would accommodate removal of PS37 with minor adjustments elsewhere. Reasonable alternative site PGP1 from Additional Housing Options consultation October 2020 should be included as part of this plan. Reasonable alternative site PGP2 from Additional Housing Options consultation October 2020 should be reconsidered against other sites in the proposed plan. The proactive sustainability gain that could be delivered by a heat recovery scheme associated with the Energy from Waste plant at Javelin Park could offset and real or perceived challenges in this location. 	
Policy wording modifications: None		
Comment		
Painswick Parish Council (841)	<ul style="list-style-type: none"> The Local Plan Review team acknowledged that the map of the boundaries for the Retail Centre were incorrectly drawn in the original plan and 'promised' that this would be rectified in the review but no changes have been made. 	EB34 Retail and Town Centre Planning Policy Advice (April 2021) sets out the latest assessment of retail and town centre issues and justification for the Retail Hierarchy identified in CP12. District Centre boundaries remain as defined in the adopted Local Plan November 2015.
	<ul style="list-style-type: none"> Amend Painswick Town Centre boundary Page 219 states – The settlement has an important but vulnerable local retail role, with a small range of local shops to serve the day-to-day needs of surrounding villages and hamlets. It remains vulnerable because this review has not amended the 	CP12 identifies Painswick as a District Centre in the Retail Hierarchy and supports maintaining and enhancing the health of all defined centres. Outside of defined centres, Delivery Policy EI6, sets out policy criteria for the protection of individual and village shops, public houses and other community uses for the continued vitality and well-being of local communities.



Core Policy CP12 - Town centres and retailing		
	boundary map as promised and continues to undermine the efforts of the Parish Council to ensure its viability. <ul style="list-style-type: none"> Painswick is a small but vibrant tourist location which will only remain that way, if the remaining businesses are supported by not permitting the loss of further retail and hospitality premises to convert to residential. 	
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Evidence base		
214	<ul style="list-style-type: none"> The Lowin Report is inaccurate. 	EB34 Retail and Town Centre Planning Policy Advice (April 2021), prepared by Avison Young, sets out the latest assessment of retail and town centre issues.
Policy wording modifications: None		



Core Policy CP13 - Demand management and sustainable travel measures				
Number of representations: 8		Support: 0	Object: 4	Comment: 4
Stakeholders	Comments		Stroud District Council Response	
Support				
No comments received		Policy wording modifications: None		
Object				
Savills for L&Q Estates (913)	<ul style="list-style-type: none"> The draft Policy omits the prima facie position that the starting point for sustainable travel is to minimise the need to travel, and that climate change and carbon reduction policies should prioritise the re-use of existing infrastructure. 		Supporting Text Paragraph 5.15 provides a context by reference to Plan Objectives and also the need to minimise the need to travel. Ahead of the EIP, the Council is updating its transport evidence base and documentation. This will be published in due course.	
Policy wording modifications: None				
Lichfields for CEG and the Charfield Landowners Consortium (923)	<ul style="list-style-type: none"> Land to the south/west of Charfield within South Gloucestershire has important cross boundary issues relevant to the emerging Stroud Local Plan and the proposed allocations to the south of the district boundary. A residential led, mixed use development - outline planning application (application ref: P19/2452/O) remains undetermined with South Gloucestershire Council (SGC) and the M5 Junction 14 Working Group. Policy CP13 relates to demand management and sustainable travel measures. The policy states proposals for major schemes will be supported where they improve the existing infrastructure network. The Plan acknowledges in Section 2 that transport modelling has identified the need for improvement works at J12, J13 and J14 of the M5. The policy therefore needs updating for this critical infrastructure. The transport impacts of the proposed strategic sites to the south of the district has been considered through the Mott Macdonald Traffic Forecasting Report (March 2021). The report 		Particular transport cross-boundary matters relate to: the transport network within the Gloucester fringe where impacts from Stroud and JCS related growth combine; the opportunities for new public transport and cycling and walking connections on the South Gloucestershire /Stroud boundary; and existing and likely future capacity issues at M5 Junction 12 (Gloucester fringe) and M5 Junction 14 (located within South Gloucestershire). The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan. The District Council continues to work closely with South Gloucestershire Council, National Highways and potential developers to monitor levels of growth and identify mitigation schemes for M5 Junction 14 and related roads (A38/B4509). South Gloucestershire Council references ongoing cooperation through Local Plan officer meetings, the Sustainable Transport Strategy and Local Transport Group and welcomes the recognition of capacity issues at M5 J14, but seeks fuller investigation of the impacts and detailed proposals for mitigation, through further joint working between Stroud District Council, National Highways, South Gloucestershire Council and WECA. Stroud District Council agrees to work together with National Highways and with South Gloucestershire Council, Gloucestershire County Council and developers, to determine appropriate infrastructure at M5	



Core Policy CP13 - Demand management and sustainable travel measures	
	<p>confirms that traffic generated by the allocation sites at Sharpness, Cam and Dursley and the employment site at Land west of Renishaw New Mills (9 ha) are all likely to use Junction 14. The Report therefore confirms that a substantial upgrade of Junction 14 within ‘Preferred Highway Mitigation’ will be required. CEG’s consultant Evoke has undertaken extensive modelling work on the junction and the options for improvement (further detail is provided within the Transport Assessments submitted as part of planning application Reference: P19/2452/O). This has confirmed that the cost of the proposed Junction 14 improvement works is anticipated to be c.£50m. This is therefore a significant issue that requires detailed consideration in the draft plan. The Stroud Sustainable Transport Strategy (STS) proposes measures to deliver modal shift not adequate to address existing capacity issues at Junction 14. There will be significant residual impacts from proposed Stroud growth on this junction that needs to be addressed through the plan. At present, CP13 is not sound without considering the cumulative impact of development on the highway network and the specific infrastructure to deliver those sites. It is therefore not positively prepared or consistent with the NPPF in relation to the test of soundness (paragraph 35). The policy is not supported by sufficient evidence of effective joint working on cross-boundary strategic matters with South Gloucestershire and for this reason the policy is not justified or effective.</p>
	<p>junctions 12, 13 and 14, safeguard land to enable the intervention, detail the triggers and timing for interventions, and devise a funding and delivery strategy for identified improvements. Ahead of the EIP, the Council is updating its transport evidence base and documentation. This will be published in due course.</p>
<p>Policy wording modifications: None</p>	



Core Policy CP13 - Demand management and sustainable travel measures		
Comment		
RCA Regeneration Ltd for Land Development and Estates Ltd (861)	<ul style="list-style-type: none"> There needs to be recognition in this policy that rural sites, and in particular exception sites or where there is a proven unmet need, may not be able to fulfil all of these aims as a result of their rural location. This is in accordance with paragraph 84 of the Framework. 	<p>Paragraphs 5.14 -15 of the supporting text to CP15 recognises the rural nature of the District and the issues that arise. Topic Paper – Transport October 2021 ((EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities. The NPPF is a material consideration in addition to development plan policy. It is not necessary to repeat national policy. On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.</p>
Policy wording modifications: None		
RCA Regeneration Ltd for Piper Homes (877)	<ul style="list-style-type: none"> There needs to be recognition in this policy that rural sites, and in particular exception sites or where there is a proven unmet need, may not be able to fulfil all of these aims as a result of their rural location. This is to bring the policy in accordance with paragraph 84 of the Framework. 	<p>Paragraphs 5.14 -15 of the supporting text to CP15 recognises the rural nature of the District and the issues that arise. Topic Paper – Transport October 2021 ((EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities. The NPPF is a material consideration in addition to development plan policy. It is not necessary to repeat national policy. On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.</p>
Policy wording modifications: None		
Pegasus Group for Robert Hitchins Ltd (879)	<ul style="list-style-type: none"> It is noted that criterion i in respect of the location of all development cases states that such schemes will <i>“be located where there are, or will be, at the time of development, choices in the mode of transport available and which minimise the distance people need to travel”</i>. It is considered that the allocation of land at Sharpness for development would not be located where there are, or will be, sufficient choices 	<p>The Council considers Strategic allocation PS36 in accordance with the development strategy. Topic Paper: The Development Strategy October 2021 (EB4) sets out the Council’s approach to identifying and assessing potential spatial strategy options and how the development strategy was selected to meet requirements. The mix of land uses proposed is designed to deliver a level of self-containment which will reduce the need to travel. The policy sets out a range of public transport and active travel provision which will provide choice for those who need to travel. The site promoter has provided further</p>



Core Policy CP13 - Demand management and sustainable travel measures		
	in the mode of transport available, to effectively minimise the distance people need to travel.	detail on how the public transport will be delivered. Delivery Policy E112 requires development proposals that are likely to have a significant impact on the local transport network to submit a Transport Assessment, as well as a Travel Plan.
	Policy wording modifications:	
	<ul style="list-style-type: none"> Policy PS36 Sharpness new settlement should be deleted for the reasons set out above. Land at Grove End Farm, Whitminster should replace the proposed new community at Sharpness. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> Paragraph 16 of the NPPF 2019 expects plans to contain policies that are clearly written and unambiguous. Whilst CP13 is clearly written, further clarity is needed regarding parking standards and whether applicants should have regard to, or adopt the Council's parking standards. The reason for clarity in this regard is the existence of parking standards produced by Gloucestershire Council which are different. It is important that applicants within Stroud District are given a clear unambiguous position to either use (as opposed to 'having regard' to) the GCC or SDC parking standards. 	Comment not relevant to this Policy. Delivery Policy E112 – Promoting transport choice and accessibility has a specific sub-section on parking standards and also appendix C of the SDLP sets this out.
	Policy wording modifications: None	
Other representations	Issues raised	Stroud District Council Response
Travel Provision and Options		
223	<ul style="list-style-type: none"> There is insufficient recognition of the real transport options for the majority of people living in the area of Berkeley and Sharpness. 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>Whilst there are existing public transport services at Berkeley and Sharpness, the proposed new settlement will deliver significant improvements. The mix of land uses proposed is designed to deliver a level of self-containment which</p>

Core Policy CP13 - Demand management and sustainable travel measures		
		<p>will reduce the need to travel. The policy sets out a range of public transport and active travel provision which will provide choice for those who need to travel. The site promoter has provided further detail on how the public transport will be delivered.</p> <p>Delivery Policy E112 requires development proposals that are likely to have a significant impact on the local transport network to submit a Transport Assessment, as well as a Travel Plan.</p>
474	<ul style="list-style-type: none"> Travel provision for PS37 is very poor. The suggestion that many will turn to rail travel is unrealistic as even a two fold increase on train travel from Cam station will make next to no impact on the increased employment travel requirements. 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>PS37 is located along the strategic highway network and adjacent to a mainline railway station. There are significant opportunities to improve public transport services in the area. On-site specifics, including pedestrian, cycle and vehicular site access, highway safety, to be addressed at the masterplan / planning application stage, in agreement with Gloucestershire Highways.</p> <p>Delivery Policy E112 requires development proposals that are likely to have a significant impact on the local transport network to submit a Transport Assessment, as well as a Travel Plan.</p>
Policy wording modifications: None		



Delivery Policy E11 - Key employment sites				
Number of representations: 4		Support: 2	Object: 1	Comment: 1
Stakeholders	Comments		Stroud District Council Response	
Support				
Land & Mineral Management for Smiths (Gloucester) Ltd (895)	<ul style="list-style-type: none"> The plan has not fully identify all sites that are appropriate for 'Key employment site' status, demonstrated by the omission of the industrial site at the Old Airfield, Moreton Valence, which is a site of a considerable size, over 10ha, with a variety of employment occupiers. 		<p>The site is in existing employment use and can be retained in existing uses. Policy E14 allows for the extension of existing buildings, site boundaries and the provision of new buildings, providing any development meets the five set criteria.</p> <p>The 2017 SALA (EB19c) identified that there may be future potential to consider a small sensitively designed employment use within existing landscaping contained area, which would need to be highly sensitive to existing landscaping and avoid further visual intrusion into a flat open countryside in the Severn Vale.</p> <p>The site is allocated in the Waste Core Strategy for a strategic residual recovery facility, therefore any future use should confirm to policy in Waste Core Strategy.</p>	
Policy wording modifications:				
	Include the Old Airfield, Moreton Valence as a 'Key employment site'		All suggested policy wording modifications will be considered by the Inspectors at the EIP.	
Object				
No comments received				
Policy wording modifications: None				
Comment				
Ridge and Partners LLP for individual (909)	<ul style="list-style-type: none"> Strongly support the protection and development of employment site EK21 but suggest that the EK21's capacity and potential is increased by further extension which can be achieved through additional allocation of Land North of Aston Down. 		<p>The site was assessed in the Employment Land Review (EB30) and it is concluded that it would be preferable to focus growth inside the existing allocated site.</p>	
Policy wording modifications: None				
	Include Land north of Aston Down as a Key employment site		All suggested policy wording modifications will be considered by the Inspectors at the EIP.	
Other	Comments		Stroud District Council Response	

Delivery Policy EI1 - Key employment sites		
representations		
214	<ul style="list-style-type: none"> The list is incomplete and should be revisited 	The Employment Land Review (EB30) seeks to review and consider all Key Employment Sites, which are assessed for suitability.
Policy wording modifications: None		



E12

Delivery Policy E12 - Regenerating existing employment sites			
Number of representations: 5	Support: 3	Object: 1	Comment: 1
Stakeholders	Comments	Stroud District Council Response	
Support			
RPS Group for Stroud Corporation NV (917)	<ul style="list-style-type: none"> Ham Mills site should be retained as a former employment site suitable for regeneration under Policy E12 for a mixture of commercial / other appropriate uses and substantial housing development. 	Comment noted.	
Policy wording modifications: None			
Object			
Gloucestershire County Council (904)	<ul style="list-style-type: none"> Delivery Policy E12 is not sound as it does not acknowledge the potential risk posed to the safeguarding of waste management facilities. Failure to accommodate this matter could also bring into question the duty to cooperate by way of undermining the MWPA’s attempt to facilitate and support an efficient and effective countywide network of waste management facilities. The MWPA would support to Delivery Policy E12 going forward if a modification was made (mostly obviously to the supporting text under paragraph 5.24). The modification should clearly articulate that regenerative development at existing employment sites would need to ensure that potential adverse impacts on existing waste management facilities, permitted sites, and areas allocated for future waste management-related uses would not occur. Regenerative development that could generate incompatible land-uses should be avoided or accompanied by sufficient mitigation that will prevent prejudicing the efficient operations of waste management-related facilities and their ability to 	The Council has prepared a Statement of Common Ground with Gloucestershire County Council, which has acknowledged this objection and where “both parties are committed to working together to resolve this soundness matter and will continue dialogue accordingly.” (Duty to Cooperate Statement (EB3)).	



Delivery Policy E12 - Regenerating existing employment sites		
	effectively implement the waste hierarchy.	
	Policy wording modifications:	
	<ul style="list-style-type: none"> The supporting text under paragraph 5.24 to be modified to articulate regenerative development at existing employment sites would need to ensure that potential adverse impacts on existing waste management facilities, permitted sites, and areas allocated for future waste management-related uses would not occur. 	Further discussion with GCC is required. All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Comment		
Pegasus Group for Quinque Stella Holdings Ltd (889)	<ul style="list-style-type: none"> The Orchestra Works (ER10) is identified under Ei2. It is no longer occupied with limited demand for employment generating uses on it. The site presents an excellent opportunity to deliver housing on a brownfield site in a sustainable location. The site should be considered for alternative uses, as per the recommendations of the ELR. 	The Employment Land Review identifies the site as possible for other uses and therefore listed within Delivery Policy Ei2. The policy does allow for other uses and will consider non-employment uses subject to requirements of policy.
	<ul style="list-style-type: none"> The policy wording allows development for non-employment uses to come forward on these sites, but also requires there to be the same level of employment opportunities as there were previously. The policy does say that this is subject to viability and site-specific circumstances; however, there is little clarity on what circumstances would allow for an exclusively non-employment use to come forward on the site (e.g. residential). 	The Employment Land Review (EB30) assessed the site and concluded that “assuming the site is still occupied by businesses then protect in the Local Plan. If this is not the case, then due to limited local value and constrained access, site could be considered for other uses.” Until evidence is clear that there is no employment value, the site should be retained for regeneration. It does not prevent other uses like residential.
	Policy wording modifications:	
	<ul style="list-style-type: none"> Orchestra Works should be removed from the list of protected sites under emerging Policy E12. Alternatively, Policy E12's wording should be amended to allow for the site's redevelopment for non-employment related uses. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.



Delivery Policy E12 - Regenerating existing employment sites		
Other representations	Issues raised	Stroud District Council Response
214	<ul style="list-style-type: none"> The Plan does not reproduce employment space for the numbers that existed previously. 	The Topic Paper: Employment (EB7) sets out the amount of employment land proposed up to 2040, which takes into account past and potential future losses.
Policy wording modifications: None		



Delivery Policy E12a - Former Berkeley Power Station				
Number of representations: 4		Support: 1	Object: 1	Comment: 2
Stakeholders	Comments		Stroud District Council Response	
Support				
No comments received	Policy wording modifications: None			
Object				
Gloucestershire County Council - MWPA (904)	<ul style="list-style-type: none"> Do not consider policy to be sound as it is not clear whether waste management-related infrastructure uses could be afforded local policy support. National policy as set out under the NPPW advises that priority for new or enhanced waste management facilities should be given to sites identified for employment uses alongside a number of other land- use types. 		The Council has agreed through the Statement of Common Ground with Gloucestershire County Council to work together through the examination process to resolve the outstanding matters raised by Gloucestershire County Council by agreeing appropriate modifications to the Plan where necessary.	
	<ul style="list-style-type: none"> Would support policy E12a going forward if a modification was made. 		Potential support noted.	
	Policy wording modifications:			
	<ul style="list-style-type: none"> Supporting text under paragraph 5.27 should be modified. Waste management-related infrastructure should be added to the list of employment uses that may be supported. 		All suggested policy wording modifications will be considered by the Inspectors at the EIP.	
Comment				
South Gloucestershire Council (914)	<ul style="list-style-type: none"> Para 5.28 refers to and supports the joint bid by SGC, SDC GCC, and the Western Gateway for a prototype nuclear fusion power plant and associated facilities as part of the STEP UK programme. SGC notes this paragraph and looks forward to continuing joint working through the Western Gateway. it would be helpful to add reference to the need to secure improvements to related infrastructure to support sustainable delivery of this project into policy E12a and supporting text. 		The Council welcomes the support of South Gloucestershire Council for the STEP project, referred to in para. 5.28. At this stage, the proposal is in the form of a bid to Government and identification within Policy E12a would be premature. However, should the bid be successful the Council would look to reference the scheme and any associated infrastructure requirements, within the SDLP.	



Delivery Policy E12a - Former Berkeley Power Station		
	<p>Policy wording modifications:</p> <ul style="list-style-type: none"> Suggested amendment to Para 5.28 adding reference to the need to secure improvements to related infrastructure to support sustainable delivery of this project into policy E12a and supporting text. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Avison Young for Nuclear Decommissioning Authority (872)	<ul style="list-style-type: none"> It is appreciated that delivery Policy E12a states that the Berkeley site will be retained for office, B2 and B8 employment uses and for employment related training and education purposes and for operations and uses associated with the decommissioning of the nuclear power station. Redevelopment for unrelated alternative uses will not be permitted. 	Support noted.
	<ul style="list-style-type: none"> It is acknowledged that reference to operations and uses associated with decommissioning is incorporated within the policy wording in accordance with our previous representations; although further clarity within this policy regarding the differences between the de-licensed and licensed elements of the site is still required in line with our previous representations. 	The Council has sought to accommodate the wording changes proposed by the representor. Paragraphs 5.25 and 5.26 include the suggested text put forward by the representor to clarify the distinctions between the licensed and de-licensed sites. It is unclear how the SDLP can be amended further to accommodate the representor's views.
	<ul style="list-style-type: none"> Local Plan Review would benefit from contextualising the on-going decommissioning process on the licensed site; in addition to employment uses and employment related training and education uses within the de-licensed site – and the distinction between the two. This would ensure that the Local Plan Review fully accounts for the current operational and future development of the Berkeley site over the Plan period. This approach suggested for the licensed site is consistent with development plans adopted elsewhere in the UK. 	The Council has sought to accommodate the wording changes proposed by the representor. Paragraphs 5.25 and 5.26 include the suggested text put forward by the representor to clarify the distinctions between the licensed and de-licensed sites. It is unclear how the SDLP can be amended further to accommodate the representor's views.

Delivery Policy EI2a - Former Berkeley Power Station		
	<p>Policy wording modifications:</p> <ul style="list-style-type: none"> Policy EI2a should incorporate the following distinction: <ul style="list-style-type: none"> The de-licensed site being acceptable for alternative uses, including employment (B1–B8) and related training and education; and The licenced site being acceptable for operations and uses associated with decommissioning, waste management and land remediation on the NLS in line with national strategies and policies and regulatory requirements. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		



Delivery Policy E14 - Development at existing employment sites in the countryside				
Number of representations: 3		Support: 2	Object: 0	Comment: 1
Stakeholders	Comments		Stroud District Council Response	
Support				
Savills (UK) Limited for Coln Residential (934)	<ul style="list-style-type: none"> Supportive of the emphasis of this policy in principle. 		Comment noted.	
	Policy wording modifications: None			
Object				
No comments received				
	Policy wording modifications: None			
Comment				
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> Criterion 3 of proposed policy E14 appear to set barriers which are either unreasonable or not consistent with the NPPF. It appears to introduce a level of sequential testing of sites. The NPPF does not require sequential testing of employment buildings. 		The Council is seeking to “encourage the reuse of existing resources” (NPPF, para.152) and considers that “the use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.” (NPPF, para.85).	
	<ul style="list-style-type: none"> Criterion 5 of proposed policy E14 appear to set barriers which are either unreasonable or not consistent with the NPPF. It uses a different definition of traffic impact than the NPPF. It suggests ‘significant traffic movements’ would be considered as a reason for refusal whereas the NPPF2019 uses the term ‘severe’. This is the national policy definition and the eSDLP should not seek to promote a contrary approach. 		The NPPF (July 2021) Paragraph 85 states where sites are adjacent to or beyond existing settlements and in locations not well served by public transport “it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads”.	
	Policy wording modifications: None			
Other representations	Issues raised		Stroud District Council Response	
No comments received				
Policy wording modifications: None				

E15

Delivery Policy E15 - Farm and forestry enterprise diversification				
Number of representations: 2		Support: 1	Object: 1	Comment: 0
Stakeholders	Comments		Stroud District Council Response	
Support				
No comments received	Policy wording modifications: None			
Object				
Gloucestershire County Council - Minerals &. Waste Planning Authority (904)	<ul style="list-style-type: none"> It is not clear whether waste management-related infrastructure uses could be afforded local policy support. National policy as set out under the NPPW advises that priority for new or enhanced waste management facilities should be given to redundant agricultural and forestry buildings and their curtilages alongside a number of other land-use types. 	The Council has prepared a Statement of Common Ground with Gloucestershire County Council, which has acknowledged this objection and where “both parties are committed to working together to resolve this soundness matter and will continue dialogue accordingly.” (Duty to Cooperate Statement (EB3).		
	Policy wording modifications: <ul style="list-style-type: none"> Waste management- related infrastructure should be added to the list of potential uses identified in the third sentence of paragraph 5.30. 	Further discussion with GCC is required. All suggested policy wording modifications will be considered by the Inspectors at the EIP.		
Comment				
No comments received	Policy wording modifications: None			
Other representations	Issues raised		Stroud District Council Response	
No comments received				
Policy wording modifications: None				



E16

Delivery Policy E16 - Protecting individual and village shops, public houses and other community uses				
Number of representations: 4		Support: 3	Object: 1	Comment: 0
Stakeholders	Comments		Stroud District Council Response	
Support				
Ram Supporters Group (52)	<ul style="list-style-type: none"> We are pleased that the basic rules concerning change of use for public houses persist from the 2015 Local plan. 		Comment noted.	
	<ul style="list-style-type: none"> We would urge SDC to consider adopting a "Pub Protection Policy" to augment the requirements outlined in Delivery Policy E16. 		Comment noted.	
Policy wording modifications: None				
Object				
Theatres Trust (174)	<ul style="list-style-type: none"> Too limited in its scope given the lack of protection elsewhere within the document for community and cultural facilities within town centres. Policy EI11 provides support for such uses, including cultural facilities, but we suggest EI6 is refined to robustly protect all facilities. This will ensure better conformity with paragraph 92 of the NPPF (2019). 		Policy EI6 provides protection for individual and village shops, public houses and other community uses in the interests of accessibility and continued community vitality and well-being. Supporting paragraph 5.37 expands on the definition of community facilities as providing for the health and well-being, social, educational, spiritual, recreational, leisure and cultural needs of the community, with explicit additional reference to including arts and cultural activities.	
Policy wording modifications: None				
Comment				
No comments received	Policy wording modifications: None			
Other representations	Issues raised		Stroud District Council Response	
86	<ul style="list-style-type: none"> Protection of commercial infrastructure especially in villages is vital to health of community 		Comment noted.	
Policy wording modifications: None				



E17

Delivery Policy E17 - Primary Shopping Areas			
Number of representations: 2	Support: 1	Object: 1	Comment: 0
Stakeholders	Comments	Stroud District Council Response	
Support			
No comments received	Policy wording modifications: None		
Object			
No comments received	Policy wording modifications: None		
Comment			
No comments received	Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response	
405	<ul style="list-style-type: none"> Support local small shops. 	Comment noted	
Policy wording modifications: None			



E18

Delivery Policy E18 - Town centres				
Number of representations: 2		Support: 1	Object: 1	Comment: 0
Stakeholders	Comments		Stroud District Council Response	
Support				
No comments received	Policy wording modifications: None			
Object				
No comments received	Policy wording modifications: None			
Comment				
No comments received	Policy wording modifications: None			
Other representations	Issues raised		Stroud District Council Response	
Evidence base				
214	<ul style="list-style-type: none"> The Lowin Report is wholly inaccurate. 		EB34 Retail and Town Centre Planning Policy Advice (April 2021), prepared by Avison Young, sets out the latest assessment of retail and town centre issues.	
Policy wording modifications: None				



Delivery Policy E19 - Floorspace thresholds for Impact Assessments				
Number of representations: 3		Support: 1	Object: 1	Comment: 1
Stakeholders	Comments		Stroud District Council Response	
Support				
No comments received	Policy wording modifications: None			
Object				
Black Box Planning for Taylor Wimpey UK Limited (936)	<ul style="list-style-type: none"> The policy is Inconsistent with national planning policy thresholds for impact assessments. The proposed threshold for the local centre at the Whaddon strategic site is 500sq m. The default threshold advised in NPPF paragraph 89 is 2,500 sq m albeit it also recognised that local thresholds can be set by LPAs. A local centre at Whaddon would not compete or undermine the scale or function of the retail offer in Gloucester City, and thus the threshold of 500sqm for an impact assessment is considered unreasonably low. The provision of local centres on strategic development sites promotes self- containment in promoting more sustainable patterns of movement rather than competing with retail provision in town centres, and therefore strategically allocated local centres should be a confirmed exemption. 		EB34 Retail and Town Centre Planning Policy Advice (April 2021) sets out the justification for a reduced impact assessment threshold reflective of local circumstances within Stroud District.	
			EB34 Retail and Town Centre Planning Policy Advice (April 2021) sets out the justification for the approach to identification and classification of new local centres.	
Policy wording modifications: None				
Comment				
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> NPPF 2019 floorspace thresholds are set to enable smaller retail businesses to locate outside town centres at a scale that has been determined to address local need. In a climate where the LPA encourages walkable neighbourhoods and community building, it is inconsistent with the NPPF 		EB34 Retail and Town Centre Planning Policy Advice (April 2021) sets out the justification for a reduced impact assessment threshold reflective of local circumstances within Stroud District and the approach to identification and classification of new local centres, supportive of new and existing communities.	



Delivery Policy E19 - Floorspace thresholds for Impact Assessments		
	2019 to then place a greater burden on smaller businesses. • When applying for planning permission the plan should encourage mixed-use developments including retail and leisure that support the local community.	
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		



Delivery Policy EI10 - Provision of new tourism opportunities				
Number of representations: 4		Support: 3	Object: 0	Comment: 1
Stakeholders	Comments		Stroud District Council Response	
Support				
No comments received		Policy wording modifications: None		
Object				
Savills (UK) Limited for The Berkeley Estate (878)	<ul style="list-style-type: none"> In Savills' experience, encouraging opportunities and increasing the provision of tourism-related facilities has been an effective method for larger estates to diversify and enhance its commercial operations. 		Comment noted.	
	<ul style="list-style-type: none"> Increased tourism provision brings multiple financial benefits to the local area and district-wide stakeholders. 		Comment noted.	
	Policy wording modifications: None			
Comment				
Gloucestershire Community Rail Partnership (917)	<ul style="list-style-type: none"> Paragraph 5.47 – 5.53 Gloucestershire Tourism Data sets –relies on older data and more generic evidence bases, and not the most relevant up to date research Tourism strategy co created with Gloucestershire districts in 2020-21 and which is data rich on the latest intelligence on tourism. 		Comment noted.	
	<ul style="list-style-type: none"> Within the Delivery policy there is no current Destination Management Organisation in Stroud and recognition of the need to address the key gap this has created. 		This is not a matter for the Local Plan.	
	<ul style="list-style-type: none"> The evidence base including the Covid 19 Recovery Planning and Map of Gloucestershire's current Visitor Economy provided through the Visit Gloucestershire Partnership should be referenced. 		It is advised not to reference documents which may change or become out of date once the Local Plan is adopted.	
Policy wording modifications: None				



Delivery Policy EI10 - Provision of new tourism opportunities		
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		



E111

Delivery Policy E111 - Providing sport, leisure, recreation and cultural facilities				
Number of representations: 3		Support: 2	Object: 0	Comment: 1
Stakeholders	Comments		Stroud District Council Response	
Support				
No comments received	Policy wording modifications: None			
Object				
No comments received	Policy wording modifications: None			
Comment				
Gloucestershire Community Rail Partnership (937)	<ul style="list-style-type: none"> Paragraph 5.47 – 5.53 Gloucestershire Tourism Data sets –relies on older data and more generic evidence bases, and not the most relevant up to date research Tourism strategy co created with Gloucestershire districts in 2020-21 and which is data rich on the latest intelligence on tourism. 		Comment noted.	
	<ul style="list-style-type: none"> Within the Delivery policy there is no current Destination Management Organisation in Stroud and recognition of the need to address the key gap this has created. 		This is not a matter for the Local Plan.	
	<ul style="list-style-type: none"> The evidence base including the Covid 19 Recovery Planning and Map of Gloucestershire’s current Visitor Economy provided through the Visit Gloucestershire Partnership should be referenced. 		It is advised not to reference document which may change or become out of date once the Local Plan is adopted.	
	Policy wording modifications: None			
Other representations	Issues raised		Stroud District Council Response	
No comments received				
Policy wording modifications: None				



Delivery Policy EI12 - Promoting transport choice and accessibility				
Number of representations: 13		Support: 5	Object: 4	Comment: 4
Stakeholders	Comments		Stroud District Council Response	
Support				
Savills for The Berkeley Estate and Coln Residential (878 & 934)	<ul style="list-style-type: none"> The requirement for new development to be planned in accordance with the Sustainable Transport Hierarchy in Policy EI12 is supported. 		Comment noted.	
Policy wording modifications: None				
Object				
Wotton Under Edge Town Council (696)	<ul style="list-style-type: none"> The lack of specific parking standards for new dwellings in Wotton (Appendix C) is likely to increase on-street parking and worsen congestion. The 2015 Local Plan made a specific statement about the parking problems in Wotton (Para 5.67) as well as setting out specific parking standards. Without such standards developers will press for minimal parking provision which would increase Wotton's congestion problems. The list of items to consider when determining parking provision (5.58) must include an assessment of local on-street parking and congestion problems. The provision of EV charging points for residents (5.58) is difficult to deliver unless dedicated off-street parking is provided. 		<p>Appendix C allows for parking provision based on individual circumstances which will require development in Wotton to provide evidence specific to the area.</p> <p>Policy EI12 and Appendix C are drafted from the perspective of seeking to address the problem of over-dependence on motorised modes of transport which has resulted in congestion, as well as issues that extend from unpleasant street environments right up to global concerns about emissions, fuel availability and fuel affordability.</p> <p>Under Parking Standards, the policy states that developers will need to justify their parking provision and states "Evidence will need to demonstrate that the level would not have a detrimental impact on the local road network"</p>	
Policy wording modifications: None				
Home Builders Federation (892)	<ul style="list-style-type: none"> Installation of active Electric Vehicle Charging Points is inappropriate. The evolution of automotive technology is moving quickly therefore a passive cable and duct approach is a more sensible and future proofed solution, which negates the potential for obsolete technology being experienced by householders. 		The policy makes no reference to the installation of "active" charging points, however Appendix C requires "adequate provision of spaces for charging plug-in and other ultra-low emission vehicles (ULEV)". As stated in the supporting text, the approach taken to this provision will be "a matter of negotiation and assessed according to individual circumstances".	
	<ul style="list-style-type: none"> The Council should not require all residential development proposals to meet or exceed the 		There is no reference to the Home Quality Mark in the policy wording.	



Delivery Policy EI12 - Promoting transport choice and accessibility		
	standards set out by the Home Quality Mark, or equivalent. The reference to the Home Quality Mark in policy wording should not convey development plan status to a document, which has not been subject to the same process of preparation, consultation and Examination as the LPR. It is not reasonable or justified for residential development proposals to be required to meet or exceed these standards. This reference should be removed.	
Policy wording modifications: None		
Savills for L and Q Estates (913)	<ul style="list-style-type: none"> Within Appendix C and the reference to electric charging points, we suggest that this is explained fully, and in practice, there remains significant debate on what this means, ie a fully functioning charging point, a ducting connection etc. 	As stated in the supporting text, the approach taken to this provision will be “a matter of negotiation and assessed according to individual circumstances”.
Policy wording modifications: None		
Lichfields for CEG & Charfield Landowners Consortium (923)	<ul style="list-style-type: none"> This policy should reference significant infrastructure issues and the mitigation required to ensure growth in Stroud is sustainable 	Infrastructure issues and mitigation measures are covered in the evidence base which underpins this policy, particularly EB60a Sustainable Transport Strategy and EB67 Gloucestershire Local Transport Plan. See also EB6 Topic Paper – Transport.
	<ul style="list-style-type: none"> The impact of strategic growth on J14 of the M5 must be fully tested taking into account cumulative growth in neighbouring local authority areas The plan should make it clear that no development should come forward until infrastructure has been design and costed for J14 and the works implemented 	EB61 Traffic Forecasting Report (March 2021) within the evidence base provides traffic modelling forecasts for proposed strategic sites.
Policy wording modifications: None		
Comment		
Highways England (873)	<ul style="list-style-type: none"> development proposals that have a significant transport impact should be supported by an appropriate transport assessment consistent with national policy and guidance 	The policy states “All development proposals should have full regard to the transport impact on the strategic and/or local transport networks. Major development proposals, or those that are likely to have a significant impact on the local transport network, will be required to submit a Transport



Delivery Policy EI12 - Promoting transport choice and accessibility		
	<ul style="list-style-type: none"> Additional traffic resulting from new development does not compromise the safe and efficient operation of the SRN. It should include a requirement that developers engage at an early stage with Highways England regarding development proposals and agree the scope of supporting information require 	Assessment as well as a Travel Plan, to demonstrate that they have fully considered safe and suitable access by all modes of transport.”
Policy wording modifications: None		
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> The expectation that applicants should provide parking in accordance with Appendix C is noted and comments have been raised earlier regarding consistency with GCC standards and which takes precedence? However, to expect applicants to then justify why their proposal accord with a numerical standard appears to create an unnecessary burden. The LPA should only expect a justification if an applicant proposes a different standard, and a planning balance needs to be struck. As an LPA it would be unhelpful to set a standard and the challenge applicants on their justification if they meet the standard 	Appendix C does not require the use of a numerical standard, but states that developers will need to justify their parking provision and that “Evidence will need to demonstrate that the level would not have a detrimental impact on the local road network”
Policy wording modifications: None		
Rapleys LLP for Crest Nicholson (897)	<ul style="list-style-type: none"> The provisions within the policy relating to the prioritisation of active travel modes over car use are not consistent with the relevant provisions within the NPPF. The policy should be based on encouraging and supporting viable and realistic alternatives to car use through demand management, active travel planning, support for public transport and walking and cycling 	<p>Disagree. The policy does not promote active travel modes over car use, but seeks the provision of sustainable transport options as an alternative to car travel. This is in keeping with NPPF para 104 (c) which states “opportunities to promote walking, cycling and public transport use are identified and pursued”.</p> <p>In reference to mitigation measures submitted with the Transport Assessment for major developments, the policy states that measures to reduce car trips through demand management will be viewed favourably.</p>
Policy wording modifications: None		



Delivery Policy EI12 - Promoting transport choice and accessibility		
Other representations	Issues raised	Stroud District Council Response
Rail travel		
423	<ul style="list-style-type: none"> It fails to mention Charfield and the need for it to have a station. The plan does not go into detail on how bus services and rail services are going to be linked. 	As stated in the policy “Where appropriate, new developments will be required to connect into the surrounding infrastructure and contribute towards new or improved walking, cycling and rail facilities within the District and the provision of an integrated public transport network across the District.” This would cover the points raised.
Footpaths		
423	<ul style="list-style-type: none"> Number of PROWs should be increased and the definitive map updated 	Not relevant to this policy. This issue is covered by EI13.
General		
496	<ul style="list-style-type: none"> The increased impact of user pressure resulting from new development should be considered 	The policy makes a requirement for the submission of a Travel Plan for major development proposals, or those that are likely to have a significant impact on the local transport network. The Transport Plan is required to set out targets and measures for addressing travel demand through a package of measures.
Policy wording modifications: None		



Delivery Policy DEI1 - District-wide mode-specific strategies				
Number of representations: 5		Support: 1	Object: 1	Comment: 3
Stakeholders	Comments		Stroud District Council Response	
Support				
No comments received	Policy wording modifications: None			
Object				
Wotton Under Edge Town Council (696)	<ul style="list-style-type: none"> Policy does not mention working with South Gloucestershire to deliver sustainable transport improvements in the South of the district i.e. re-opening Charfield Station and M5 J14 interchange strategy 		The policy does not name all key partners, but it is acknowledged that transport strategies will need to link into neighbouring districts where necessary, including South Gloucestershire. There are references to these transport aspects in para. 2.3.29 of the SDLP. The proposed walking and cycling route from Wotton to Charfield in South Gloucestershire is also referred to in Policy EI13.	
	<ul style="list-style-type: none"> District wide parking strategy must consider each location & not impose uniform policy across district 		Comment noted.	
Policy wording modifications: None				
Comment				
No comments received	Policy wording modifications: None			
Other representations	Issues raised		Stroud District Council Response	
897	<ul style="list-style-type: none"> The wording of DEI1 does not present a clear policy, it merely describes what the Council intends to do in pursuit of developing different transport strategies across the district, accordingly it is neither justified or effective. If required, it should be included as supporting text introducing the Council's approach to the promotion of sustainable transport choices. 		The policy underpins the objectives of the Sustainable Transport Strategy 2019. The strategies to be developed will influence development and how it will enhance sustainable travel opportunities. It is therefore seen as an important delivery policy.	
913	<ul style="list-style-type: none"> Not clear what the intention of this policy is and how it relates to development proposals. A sustainable transport strategy already underpins the emerging Plan. 		The policy underpins the objectives of the Sustainable Transport Strategy 2019, proposing topic specific strategies to refine those objectives. The strategies to be developed will influence development and how it will enhance sustainable travel opportunities.	
Policy wording modifications: None				

Delivery Policy EI13 - Protecting and extending our walking and cycling routes			
Number of representations: 6		Support: 6	Object: 0
Comment: 0			
Stakeholders	Comments	Stroud District Council Response	
Support			
No comments received	Policy wording modifications: None		
Object			
No comments received	Policy wording modifications: None		
Comment			
No comments received	Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response	
Public Rights of Way (PROW)			
423	<ul style="list-style-type: none"> PROWs are not kept free of obstacles or properly maintained 	Comment noted, but maintenance is not a matter for the Local Plan.	
423	<ul style="list-style-type: none"> Number of PROWs should be increased and the definitive map updated 	The first line of the policy states that the Council will “ <i>support and encourage proposals that <u>develop and extend</u> our walking and cycling network. Major development should provide <u>new walking and cycling routes</u> within the development and connect to nearby established and proposed walking and cycling routes.</i> ”	
496	<ul style="list-style-type: none"> The increased impact of user pressure resulting from new development should be considered 	The policy looks to support and encourage the <u>development</u> and <u>extension</u> of our walking and cycling network, thus providing a strategic network of walking and cycling routes across the district. This would need to be done in the context of other infrastructure policies within the plan, particularly EI12 which would require development proposals to have full regard to the transport impact on the strategic and/or local transport networks.	
Policy wording modifications: None			

EI14

Delivery Policy EI14 - Provision and protection of rail stations and halts				
Number of representations: 5		Support: 3	Object: 1	Comment: 1
Stakeholders	Comments		Stroud District Council Response	
Support				
No comments received		Policy wording modifications: None		
Object				
Wotton Under Edge Town Council (696)	<ul style="list-style-type: none"> The policy (and 5.72) should include working with SGC to promote the re-opening of Charfield railway station which is needed to deliver public transport improvements to Wotton and the South of the district. 		The purpose of Policy EI14 is to support the delivery of rail stations and hubs within Stroud District. The SDLP cannot include planning policies within it relating to the use of land within another District. However, the SDLP does include the specific requirement for the Land west of Renishaw New Mills employment allocation within Stroud District to provide contributions towards the re-opening of Charfield Station within South Gloucestershire to enhance sustainable transport access and improve connectivity of the site to the wider local area.	
		Policy wording modifications: None		
Comment				
Network Rail (3)	<ul style="list-style-type: none"> Recognise the need for various feasibility studies, timetabling and third party funding needs for any proposed stations along the Bristol-Birmingham main line. 		Comment noted. Since the SDLP was submitted, the Council has been awarded funding under the Restoring Your Railway Ideas Fund to prepare a Strategic Outline Business Case (SOBC) for reopening the Stonehouse Bristol Road station. This work, to be completed by September 2022 is involving Network Rail in the preparation of a rail capacity study and as a partner in the project.	
		Policy wording modifications: None		
Other representations	Issues raised		Stroud District Council Response	
Stonehouse/Stroudwater Station				
214	<ul style="list-style-type: none"> Encourage the re-opening of the Stonehouse/ Stroudwater Station opposite Stonehouse Court Hotel. 		Support noted. Since the SDLP was submitted, the Council has been awarded funding under the Restoring Your Railway Ideas Fund to prepare a Strategic Outline Business Case (SOBC) for reopening the Stonehouse Bristol Road station. This work, to be completed by September 2022 is involving Network Rail in the preparation of a rail capacity study and as a partner in the project.	
		Policy wording modifications: None		



EI15

Delivery Policy EI15 - Protection of freight facilities at Sharpness Docks				
Number of representations: 3		Support: 3	Object: 0	Comment: 0
Stakeholders	Comments		Stroud District Council Response	
Support				
The Canal & River Trust (496)				
	Policy wording modifications:			
	<ul style="list-style-type: none"> Please amend the Canal & River Trust title and the Gloucester & Sharpness canal name, both use an ampersand not 'and'. 		Agreed, as Minor Modifications.	
Object				
No comments received				
	Policy wording modifications: None			
Comment				
No comments received				
	Policy wording modifications: None			
Other representations	Issues raised		Stroud District Council Response	
No comments received				
Policy wording modifications: None				



EI16

Delivery Policy EI16 - Provision of public transport facilities			
Number of representations: 1	Support: 1	Object: 0	Comment: 0
Stakeholders	Comments		Stroud District Council Response
Support			
No comments received	Policy wording modifications: None		
Object			
No comments received	Policy wording modifications: None		
Comment			
No comments received	Policy wording modifications: None		
Other representations	Issues raised		Stroud District Council Response
No comments received			
Policy wording modifications: None			



Core Policy CP14 - High quality sustainable development				
Number of representations: 16		Support: 8	Object: 0	Comment: 8
Stakeholders	Comments		Stroud District Council Response	
Support				
North Nibley Parish Council (875)	<ul style="list-style-type: none"> Supports the policies designed to protect, conserve and enhance the countryside and its biodiversity especially within the Cotswolds AONB. 		Comment noted	
	Policy wording modifications: None			
Savills (UK) Limited for The Berkeley Estate (934)	<ul style="list-style-type: none"> Supports SDC's aspirations for high quality design in accordance with the revised NPPF. 		Comment noted	
	Policy wording modifications:			
	<ul style="list-style-type: none"> It is recommended that further clarity is required at criterion 12: what is the 'larger area' referred to within this strand of the policy and how is 'comprehensive' measured? The Draft Plan should set out the purpose of this criterion. 		This wording appears in the Adopted Local Plan (2015) CP14. It has been implemented without issue. The purpose of this criterion is self-explanatory and reflects NPPF Section 11 and in particular paragraphs 119, 124 and 125(c).	
Savills (UK) Limited for Coln Residential (934)	<ul style="list-style-type: none"> Suggest minor amendment to criterion 14, replacing "motor car" with "private vehicular transport" 		This wording appears in the Adopted Local Plan (2015) CP14. It has been implemented without issue. The term private vehicular transport could include electric buggies, electric bikes etc. and this would be inappropriate.	
	<ul style="list-style-type: none"> Supports SDC's aspirations for high quality design in accordance with the NPPF. 		Comment noted.	
	<ul style="list-style-type: none"> It is recommended that further clarity is required at criterion 12: what is the 'larger area' referred to within this strand of the policy and how is 'comprehensive' measured? The Draft Plan should set out the purpose of this criterion. 		This wording appears in the Adopted Local Plan (2015) CP14. It has been implemented without issue. The purpose of this criterion is self-explanatory and reflects NPPF Section 11 and in particular paragraphs 119, 124 and 125(c).	
Policy wording modifications: None				
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> Supports this policy, especially the requirement to 'Contribute to the retention, conservation and enhancement of important biodiversity interests as it aligns with NPPF requirements and the 25 Year Environment Plan. 		Comment noted	



Core Policy CP14 - High quality sustainable development		
	<p>Policy wording modifications:</p> <ul style="list-style-type: none"> Proposes that a connection is made here to CP5 and the requirement for strategic allocations to deliver GI to Building with Nature or equivalent standards. 	The Local Plan should be read as a whole, so there is no need to cross reference to other policies within it.
Object		
No comments received		
	Policy wording modifications: None	
Comment		
Copperfield for Colethrop Farm Limited (906)	<ul style="list-style-type: none"> Proposed Policy CP14 suggests applicants should consider the impacts on development from several sources including noise, air, water etc. Whilst it is reasonable to explore the impact of 'existing' sources, it is unreasonable to expect an applicant to determine the impact from 'potential' sources of pollution. The scope and ability to assess such theoretical impacts would be difficult for applicants to define. To make the policy clear, it should only refer to existing sources. 	This wording appears in the Adopted Local Plan (2015) CP14. It has been implemented without issue. There could be impacts from adjacent development which has yet to be implemented or changing circumstances to existing sources which may need assessment. An application must not be considered in isolation.
	<ul style="list-style-type: none"> It is noted in the last paragraph of CP14 that the eSDLP highlights a list of documents the LPA wishes to receive with applications. It would help applicants to be provided with a specific list of expectations that then translates into the Council's Validation checklist. This removes ambiguity for the range of applicants that need to use this plan. 	Validation Checklists are a separate matter to policy requirements and criteria. It is not appropriate to combine the two in all cases.
	<p>Policy wording modifications:</p> <ul style="list-style-type: none"> It is unreasonable to expect an applicant to determine the impact from 'potential' sources of pollution. The scope and ability to assess such theoretical impacts would be difficult for applicants to define. To make the policy clear, it should only refer to existing sources. 	



Core Policy CP14 - High quality sustainable development		
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> CP14 reiterates several requirements which are equally covered by other policies in the Plan as well as in national guidance. This repetition conflicts with the need for 'succinct' plans in paragraph 15 of the Framework. 	Policy CP14 reasonably sets out the Council's expectations and a checklist to achieve High Quality Sustainability Development in this District. There will be some overlap possibly with other policy criteria in the Local Plan (which may or may not apply to a proposed development).
	<ul style="list-style-type: none"> It is equally not clear in the policy as to whether the requirements are mandatory or whether a balanced judgement can be reached in terms of their compliance within the policy as well as how they relate to other policies. For example, in conjunction with other submissions, Seven Homes is seeking to make best use of the land covered by allocation PS44 and increase the number of dwellings, which would better align with part 10 of the policy. 	Each application will be considered on its own merits and taking into account other material considerations as to whether the development will comply with policy. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
	<ul style="list-style-type: none"> Further repetition to allotment/community orchards provision in major development is not necessary and should be removed. 	The Council policies and accompanying evidence has demonstrated this need. Allotments and community orchards contribute to health and wellbeing, biodiversity, local character and local food production benefits, amongst others.
Policy wording modifications: None		
Gladman Developments (905)	<ul style="list-style-type: none"> Core Policy – CP14 High Quality Sustainable Development is proposed to be updated through the LPR to reflect changes in national policy with regards to biodiversity net gain. Specifically, part 9 of the policy refers to biodiversity net gain. It is important that the long term impacts are considered when reviewing proposals for biodiversity net gain taking into account that the measures provided as part of the development will need to mature beyond the build period. 	Comment noted
	<ul style="list-style-type: none"> If off-site mitigation provides the best opportunity for biodiversity gain, then the policy should be flexible enough to allow for this and it should not be ruled out from the planning application process. 	Comment noted



Core Policy CP14 - High quality sustainable development		
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> CP14 reiterates several requirements which are equally covered by other policies in the Plan as well as in national guidance. This repetition conflicts with the need for 'succinct' plans in paragraph 15 of the Framework. 	Policy CP14 reasonably sets out the Council's expectations and a checklist to achieve High Quality Sustainability Development in this District. There will be some overlap possibly with other policy criteria in the Local Plan (which may or may not apply to a proposed development).
	<ul style="list-style-type: none"> It is equally not clear in the policy as to whether the requirements are mandatory or whether a balanced judgement can be reached in terms of their compliance within the policy as well as how they relate to other policies. For example, in conjunction with other submissions, Seven Homes is seeking to make best use of the land covered by allocation PS44 and increase the number of dwellings, which would better align with part 10 of the policy. 	Each application will be considered on its own merits and taking into account other material considerations as to whether the development will comply with policy. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
	<ul style="list-style-type: none"> Further repetition to allotment/community orchards provision in major development is not necessary and should be removed. 	The Council policies and accompanying evidence has demonstrated this need. Allotments and community orchards contribute to health and wellbeing, biodiversity, local character and local food production benefits, amongst others.
Policy wording modifications: None		
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> CP14 reiterates several requirements which are equally covered by other policies in the Plan as well as in national guidance. This repetition conflicts with the need for 'succinct' plans in paragraph 15 of the Framework. 	Policy CP14 reasonably sets out the Council's expectations and a checklist to achieve High Quality Sustainability Development in this District. There will be some overlap possibly with other policy criteria in the Local Plan (which may or may not apply to a proposed development).
	<ul style="list-style-type: none"> It is equally not clear in the policy as to whether the requirements are mandatory or whether a balanced judgement can be reached in terms of their compliance within the policy as well as how they relate to other policies. For example, in conjunction with other submissions, Seven Homes is seeking to make best use of the land covered by allocation PS44 and increase the number of dwellings, which would better align with part 10 of the policy 	Each application will be considered on its own merits and taking into account other material considerations as to whether the development will comply with policy. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.



Core Policy CP14 - High quality sustainable development		
	<ul style="list-style-type: none"> Further repetition to allotment/community orchards provision in major development is not necessary and should be removed. 	The Council policies and accompanying evidence has demonstrated this need. Allotments and community orchards contribute to health and wellbeing, biodiversity, local character and local food production benefits, amongst others.
Policy wording modifications:		
Rapleys LLP for Crest Nicholson Land Partnerships (897)	<ul style="list-style-type: none"> The final sentence of the policy is not sufficiently clear as to when such documents should be provided in support of proposals; in any case it could be deleted without undermining the purpose or effectiveness of the policy. This sentence is not justified. 	Policy CP14 reasonably sets out the Council's expectations and a checklist to achieve High Quality Sustainability Development in this District. To assist any judgement Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection. The policy paragraph can be read in conjunction with the Making Places section of the Local Plan and officers can advise regarding on-site specifics to be agreed at the planning application stage.
Policy wording modifications:		
	<ul style="list-style-type: none"> Delete final sentence. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Savills for L & Q Estates (913)	<ul style="list-style-type: none"> This policy duplicates a number of other policies contained throughout the Pre-Submission Plan, and suggest that it is revised to reduce this. 	Policy CP14 reasonably sets out the Council's expectations and a checklist to achieve High Quality Sustainability Development in this District. There will be some overlap possibly with other policy criteria in the Local Plan (which may or may not apply to a proposed development).
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Flood Risk		
214	<ul style="list-style-type: none"> Beware of flood risk being heightened by way of development especially in the Severn Vale. 	All Local Plan sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation including taking account of climate change and surface water aspects. Any on-site specifics to be agreed at the planning application stage. This will be reviewed in any future iterations
Sustainability		
423	<ul style="list-style-type: none"> CP14 14 rules out nearly all the development as they are not at a location that is near to essential services and good transport links to services by means other 	Each application will be considered on its own merits and taking into account other material considerations all being weighed in the planning balance as to whether the development can comply with policy.



Core Policy CP14 - High quality sustainable development		
	<p>than motor car.</p> <ul style="list-style-type: none"> CP14,14 – With corvid there will be an increase in home working, but the proposals will still significantly increase the number of commuters. Also thanks to corvid residents use online shopping. Will still need corner shops that are located in easy walking distance. Content to walk into Berkeley for shopping (nearly a 2 mile walk), but persuading the average person to walk more than 1/2 mile to their local corner shop will prove interesting. 	<p>Policy CP14 reasonably sets out the Council’s expectations and a checklist to achieve High Quality Sustainability Development in this District. The Local Plan should be read as a whole and with the accompanying evidence base covers retail, local facilities, transport and accessibility matters. For example the Topic Paper – Transport October 2021 ((EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices.</p>
General Comment		
405	<ul style="list-style-type: none"> The area to be here for children to enjoy. 	Comment not relevant to this Policy.
Policy wording modifications: None		



Core Policy CP15 - A quality living and working countryside				
Number of representations: 13		Support: 7	Object: 1	Comment: 5
Stakeholders	Comments		Stroud District Council Response	
Support				
North Nibley Parish Council (875)	<ul style="list-style-type: none"> Supports the policies designed to protect, conserve and enhance the countryside and its biodiversity especially within the Cotswolds AONB including CP15. With respect to Policy CP15 (1) greater tests and proof should be required to demonstrate that proposals are essential to the maintenance or enhancement of a sustainable farming or forestry enterprise including financial and functional tests as is required under this policy for proposed farming or forestry dwellings in the countryside (criterion iv). Exemption to this requirement may be applied where it is clearly demonstrated that a building is essential to support a community led project such as Gloucestershire Wildlife Trust/Orchard Trust or where there is a proven wider community, sustainability or environmental benefit. 		Comment noted. The Council considers that the policy criteria are sufficiently strong to prevent proliferation of development in rural areas away from facilities and services.	
Policy wording modifications: None				
Savills (UK) Limited for The Berkeley Estate (878)	<ul style="list-style-type: none"> The principle of this policy is supported, which provides flexibility for rural-based business and organisations to successfully operate. This policy should not act as a hindrance to property owners, businesses or other organisations, nor should this policy be applied too rigidly within the determination of applications. 		Comment noted	
Policy wording modifications: None				
Savills (UK) Limited for Coln Residential (934)	<ul style="list-style-type: none"> Supportive of the intentions of this policy. However, when undertaking the assessment of the development potential of land which falls outside of a SDL, the default position is to consider for land to be 		The supporting text to Policy CP15 makes clear that the Council will facilitate and promote sustainable patterns of development and sustainable communities in rural areas. SDLs are an established planning tool. The Plan's strategic approach to settlement development limits is evidenced through the	



Core Policy CP15 - A quality living and working countryside		
	<p>deemed 'open countryside'. At criterion 9 of this Policy, it is not, therefore, considered necessary to limit the potential to deliver up to 9 dwellings to Tier 3b, 4a or 4b settlements.</p>	<p>discussion paper Review of Settlement Development Limits (April 2018) (EB74). The figure of nine dwellings is appropriate as it does not constitute major development as defined in the Local Plan Glossary in Appendix E. Supporting text paragraph 2.9.16 explains that the settlements set out within the CP3 hierarchy all have defined settlement development limits, within and (exceptionally) adjacent to which suitable development may be permitted. The nature and extent of "suitable" development is defined through various Core and Delivery polices, allowing for holistic consideration of settlement-specific needs, opportunities and constraints.</p>
Policy wording modifications		
	<ul style="list-style-type: none"> The policy should be amended by deleting reference to this policy being specific to tiers within specific tiers. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
Object		
SF Planning Limited (474)	<ul style="list-style-type: none"> Policy is overly restrictive in relation to the re-use of rural buildings. Part (v) should be amended to comply with the NPPF. 	<p>This policy criterion is considered necessary to facilitate and promote sustainable patterns of development and sustainable communities in rural areas. The maintenance of local countryside character and a high quality environment are important considerations.</p>
Policy wording modifications:		
	<ul style="list-style-type: none"> v) in the case of proposals to re-use redundant or disused rural buildings, these should be capable and worthy of conversion without substantial reconstruction or significant alteration. Any such conversion will provide an enhancement of its immediate setting. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>



Core Policy CP15 - A quality living and working countryside		
Comment		
Copperfield for Colethrop Farm Limited (906)	<ul style="list-style-type: none"> The Council wishes to encourage development of a particular scale on the outside edge of tier 3b, 4a and 4b settlements, but there is no evidence to suggest a limit of 9 dwellings is appropriate. 	<p>The supporting text to Policy CP15 makes clear that the Council will facilitate and promote sustainable patterns of development and sustainable communities in rural areas. SDLs are an established planning tool. The Plan’s strategic approach to settlement development limits is evidenced through the discussion paper Review of Settlement Development Limits (April 2018) (EB74). The figure of nine dwellings is appropriate as it does not constitute major development as defined in the Local Plan Glossary in Appendix E. Supporting text paragraph 2.9.16 explains that the settlements set out within the CP3 hierarchy all have defined settlement development limits, within and (exceptionally) adjacent to which suitable development may be permitted. The nature and extent of “suitable” development is defined through various Core and Delivery policies, allowing for holistic consideration of settlement-specific needs, opportunities and constraints.</p>
	<ul style="list-style-type: none"> Settlement boundaries are very tightly drawn. There has been no planned development to maintain settlements over successive plan periods. Should create a more flexible policy that aligns with the NPPF (2019). It is suggested that if the LPA wish to refer to 9 dwellings, then the criterion should also allow for greater delivery where there is a proven need, or it is logical and sustainable to make the best use of a defined site which may accommodate more development in line with the wider plan. This would support all types of housing need including an ability to maintain services within a sustainable and walkable distance. 	
Policy wording modifications: None		
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> The objective of the policy is to protect the countryside from development outside of settlement boundaries. However, the housing allocations in the Plan sit outside of the defined settlement boundaries and are therefore, at risk from being caught by the Policy. It is recommended that the Policy is amended to only be applicable to sites outside of settlement boundaries and allocations in the Plan. 	<p>The Council considers that in order to achieve development that facilitates and promotes sustainable patterns of development in rural areas, SDLs are an important and established planning tool to help maintain local countryside character and a high quality environment. The Plan’s strategic approach to settlement development limits is evidenced through the discussion paper Review of Settlement Development Limits (April 2018) (EB74). Policies CP2 and CP3 make clear that development will take place within settlement development limits, at development sites allocated in the SDLP (some of which are conceived as planned urban extensions or new settlements in their own right), and that limited development will occur outside SDLs, in</p>



Core Policy CP15 - A quality living and working countryside		
		accordance with other policies of the Plan. SDLs are not extended to accommodate potential development sites or the Plan's site allocations because they are yet to be developed and the intention behind SDLs is to define the current extent of existing settlements, marking the transition to countryside.
	Policy wording modifications:	
	<ul style="list-style-type: none"> It is recommended that the Policy is amended to only be applicable to sites outside of settlement boundaries and allocations in the Plan. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Gladman Developments Limited (905)	<ul style="list-style-type: none"> Core Policy CP15 provides a series of exceptions for where development will be considered outside of SDLs in the open countryside. These include rural exceptions sites, replacement dwellings and schemes of up to 9 dwellings at tier 4a or 4b settlements with support from the local community. This approach to development in the open countryside to be too restrictive. In this regard a criteria based policy providing additional flexibility would be appropriate here. 	The supporting text to Policy CP15 makes clear that the Council will facilitate and promote sustainable patterns of development and sustainable communities in rural areas. SDLs are an established planning tool. The Plan's strategic approach to settlement development limits is evidenced through the discussion paper Review of Settlement Development Limits (April 2018) (EB74). The figure of nine dwellings is appropriate as it does not constitute major development as defined in the Local Plan Glossary in Appendix E. Supporting text paragraph 2.9.16 explains that the settlements set out within the CP3 hierarchy all have defined settlement development limits, within and (exceptionally) adjacent to which suitable development may be permitted. The nature and extent of "suitable" development is defined through various Core and Delivery policies, allowing for holistic consideration of settlement-specific needs, opportunities and constraints.
	Policy wording modifications:	
	<ul style="list-style-type: none"> Policy CP15 – requires amending in line with DHCP1. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Wessex Water (280)	<ul style="list-style-type: none"> Core Policy CP15 provides where development may be permitted outside of defined settlement development limits. Essential infrastructure development is not included. Wessex Water is continually investing to maintain and provide new infrastructure. As a statutory undertaker, some works are permitted development, but certain works will require planning consent from the Local Planning 	The Council recognises that Sewage Treatment Works and Water Supply infrastructure such as reservoirs are often located in rural areas. The Council considers criterion 7 takes account of this with "it will involve essential community facilities." The Council would welcome continued dialogue with Wessex Water.



Core Policy CP15 - A quality living and working countryside		
	<p>Authority. Recommend that the proposed policy on countryside development is not restrictive on infrastructure development required outside of defined settlement development limits.</p>	
	Policy wording modifications:	
	<ul style="list-style-type: none"> • Insertion of an additional principle detailing that proposals outside of settlement development limits will be permitted where the proposal is for infrastructure development. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
RPS Group for Redrow Homes Limited (948)	<ul style="list-style-type: none"> • The Pre-Submission Draft Plan’s settlement boundary maps do not include the strategic sites within the areas defined settlement limits. For example, strategic site G1. It is therefore considered that to avoid any doubt or inconsistencies, the boundary of the strategic sites should be included with the defined settlement limits of the Local Plan proposals maps. The strategic sites appear to conflict with Policy CP15. 	<p>Policies CP2 and CP3 make clear that development will take place within settlement development limits, at development sites allocated in the SDLP (some of which are conceived as planned urban extensions or new settlements in their own right), and that limited development will occur outside SDLs, in accordance with other policies of the Plan. The main reason why allocated sites are not shown within SDLs is that they are yet to be developed and the intention behind SDLs is to define the current extent of existing settlements. If an allocated site were not to come forward in a comprehensively planned manner, inclusion of the site within SDLs could allow for a smaller speculative scheme to be justified in a manner contrary to the aims of SDLs and the Local Plan. Once development has been completed, the settlement development limits may be amended to reflect the revised built extent of development, as part of a comprehensive review. The Plan’s strategic approach to settlement development limits is evidenced through the discussion paper Review of Settlement Development Limits (April 2018) (EB74).</p>
	Policy wording modifications:	
	<ul style="list-style-type: none"> • Land included within strategic development sites should be included within the defined settlement boundaries for each corresponding settlement. In particular, Site G1 – Land South of Hardwicke should be included within the defined settlement limits of Hardwicke. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.



Core Policy CP15 - A quality living and working countryside		
Other representations	Issues raised	Stroud District Council Response
Inconsistent application of policy		
474	<ul style="list-style-type: none"> Support but many contradictions with the PS37 site. 	Welcome policy CP15 support, but the Council considers Strategic Site Allocation PS37 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
Policy wording modifications: None		





Delivery Policy ES1 - Sustainable construction and design				
Number of representations:18		Support: 7	Object: 4	Comment: 7
Stakeholders	Comments		Stroud District Council Response	
Support				
Copperfield for Colethrop Farm Limited (906)	<ul style="list-style-type: none"> Support the need to address climate change and the move towards zero carbon development. The Government has put in place legislation and has identified further legislation to enable this to be delivered at a local level. It is important the eSDLP aligns with the process set by the Government and that the full viability impacts of this are carefully managed. It is not clear whether HDH viability fully balances the costs of strategic infrastructure, other infrastructure and the additional cost of advancing the move to Carbon Zero without any phased introduction. It would be helpful to have details of Stroud Carbon Offset Fund as part of the Local Plan evidence base. 		<p>Support noted.</p> <p>The Council considers the specific standards, to achieve net zero carbon zero for all new development, are justified by the international importance of minimising climate change as soon as possible. There is also emerging evidence that the UK is not delivering progress at the rate required to meet its international obligations and further actions are required at a local level. The Council’s Viability Assessment (May 2021) (EB70) has modelled the expected costs of this policy when assessing overall viability. It is acknowledged that costs and values vary over time. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p>	
Policy wording modifications: None				
Blue Fox Planning Ltd for Persimmon Homes Severn Valley (928)	<ul style="list-style-type: none"> As a matter of principle setting energy requirements for new development as part of the overarching climate change strategy is supported. It is recognised changes to the Planning and Energy Act 2008 would prevent local planning authorities from being able to exceed the minimum energy efficiency requirements of Building Regulations. Policies must not be inconsistent with relevant national policies for England. It is essential the policy framework is consistent with national policy and Building Regulations. 		<p>Support noted.</p> <p>National planning practice guidance confirms that “In their development plan policies, local planning authorities can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes [and] are not restricted or limited in setting energy performance standards above the building regulations for non-housing developments.”</p> <p>(Paragraph: 012 Reference ID: 6-012-20190315)</p>	
Policy wording modifications:				
	<ul style="list-style-type: none"> Given the emphasis of the Future Homes Standard, Policy ES1 should be less prescriptive and focus on 		<p>Specific standards, to achieve net zero carbon zero for all new development, are justified by the international importance of minimising climate change as</p>	



Delivery Policy ES1 - Sustainable construction and design		
	<p>ensuring that future development proposals accord with the prevailing Building Regulations and changes to be implemented through the Future Homes Standard, including any identified transitional arrangements. This will ensure that the Local Plan remains up to date should it be the case the Section 43 of the Deregulation Act 2015 is implemented.</p>	<p>soon as possible and are consistent with the UK's Climate Change Act 2008 and its commitments under the Paris Agreement (2016).</p> <p>The Planning and Compulsory Purchase Act 2004 (Section 19), as amended by the Planning Act 2008, put a legal duty on local authorities to ensure that, taken as whole, local plan policy contributes to the mitigation of, and adaptation to, climate change. The NPPF advises (para 153 and footnote 53) that plans should adopt a proactive approach to mitigating climate change in line with the Climate Change Act 2008, and (para 152) should secure radical reductions in greenhouse gas emissions.</p> <p>There is evidence that the UK is not delivering progress at the rate required to meet its obligations and further actions are required at a local level. Analysis¹ from the Committee on Climate Change is that the UK is not on track to meet its legislated emission reduction commitments within the 4th, 5th and 6th carbon budgets, and therefore not currently on track to reach net zero emissions by 2050 as required by the Climate Change Act.</p> <p>Taken as a whole policy ES1 will ensure that new development is net zero carbon, accelerating and increasing emission reductions over and above the Future Homes Standard, thereby contributing to nationwide carbon emission reductions.</p>
RPS Group for Stroud Corporation NV (917)	<ul style="list-style-type: none"> • Welcomes this policy approach to achieve sustainable development. However, recommend that these standards should be applied flexibly to take account of sites with specific constraints where it is not possible or appropriate to achieve all of the standards. 	The policy provides flexibility where it can be clearly demonstrated that the standards are not viable for the development in question.
Policy wording modifications: None		

¹ <https://www.theccc.org.uk/about/our-expertise/advice-on-reducing-the-uks-emissions/#:~:text=The%20Climate%20Change%20Act%20requires,over%20a%20five%20year%20period.&text=The%20Committee%20will%20advise%20on%20the%20sixth%20Carbon%20Budget%20in%20December%202020.>



Delivery Policy ES1 - Sustainable construction and design		
RPS Group for Redrow Homes Ltd (948)	<ul style="list-style-type: none"> Support the Council's intention to deliver carbon neutral development by 2030. Recognises that the policy follows the requirements that are forthcoming from the UK Government's target of achieving net-zero carbon by 2050. Already have plans and strategies in place to meet the requirements of this policy. 	Comment noted.
Policy wording modifications: None		
Object		
Wotton under Edge Town Council (696)	<ul style="list-style-type: none"> Criterion 8 (Page 279) requires off-street parking to be provided, yet the Plan (Policy EI12 and Appendix C) seeks to reduce the number of off-street parking spaces to be provided for new developments. These policies are in conflict. 	Policy ES1 does not require off street parking to be provided. It simply states that where off street parking is provided, it should include electric vehicle points. The policies are not in conflict.
Policy wording modifications: None		
Home Builders Federation (HBF) (892)	<ul style="list-style-type: none"> Carbon Neutral by 2030 is ahead of the Government target of net Zero Carbon 2050. All new development must be designed to follow the Energy Hierarchy principle to meet standards, which move progressively towards zero carbon, in terms both of regulated and unregulated emissions. New development should be constructed to achieve the highest viable energy efficiency and designed to maximise the delivery of decentralised renewable or low-carbon energy generation. The Government Response to The Future Homes Standard 2019 provides an implementation roadmap. Transitional arrangements will apply to individual homes rather than an entire development and the transitional period will be one year. Consider that the Council should comply with the Government's intention of setting standards for energy efficiency through the Building Regulations. 	<p>Specific standards, to achieve net zero carbon zero for all new development, are justified by the international importance of minimising climate change as soon as possible and are consistent with the UK's Climate Change Act 2008 and its commitments under the Paris Agreement (2016).</p> <p>The Planning and Compulsory Purchase Act 2004 (Section 19), as amended by the Planning Act 2008, put a legal duty on local authorities to ensure that, taken as whole, local plan policy contributes to the mitigation of, and adaptation to, climate change. The NPPF advises (para 153 and footnote 53) that plans should adopt a proactive approach to mitigating climate change in line with the Climate Change Act 2008, and (para 152) should secure radical reductions in greenhouse gas emissions.</p> <p>There is evidence that the UK is not delivering progress at the rate required to meet its obligations and further actions are required at a local level. Analysis from the Committee on Climate Change is that the UK is not on track to meet its legislated emission reduction commitments within the 4th, 5th and 6th carbon budgets, and therefore not currently on track to reach net zero</p>



Delivery Policy ES1 - Sustainable construction and design		
		emissions by 2050 as required by the Climate Change Act.
	<ul style="list-style-type: none"> The Council’s final viability assessment appraisals underestimate costs for Future Homes Standard and unregulated emissions are excluded. 	<p>The Council’s Viability Assessment (May 2021) (EB70) has modelled the expected costs of this policy when assessing overall viability. It is acknowledged that costs and values vary over time. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p>
	<ul style="list-style-type: none"> Bullet Point 8 of Delivery Policy ES1 proposes that new developments with off road parking should provide electric vehicle charging points (Home Quality Mark or equivalent). The Government’s preferred option is the introduction of a new requirement for EVCPs under Part S of the Building Regulations will introduce a standardised consistent approach to EVCPs in new buildings across the country. Until the introduction of proposed changes to Part S of the Building Regulations, the physical installation of active EVCPs is inappropriate. 	<p>National planning practice guidance confirms that “In their development plan policies, local planning authorities can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations..” (Paragraph: 012 Reference ID: 6-012-20190315)</p> <p>There is evidence (see above) that the UK is not delivering progress at the rate required to meet its obligations and further actions are required at a local level.</p>
	<ul style="list-style-type: none"> Avoid Council’s specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council should not need to set local energy efficiency standards to achieve the shared net zero goal with the Future Homes Standard 2025. This policy is unnecessary because it is superseded by the Future Homes Standard. 	<p>National planning practice guidance confirms that “In their development plan policies, local planning authorities can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations..” (Paragraph: 012 Reference ID: 6-012-20190315)</p> <p>There is evidence (see above) that the UK is not delivering progress at the rate required to meet its obligations and further actions are required at a local level.</p>
	<ul style="list-style-type: none"> Serious concerns about the capacity of the existing electrical network in the UK. The supply from the power grid is already constrained in many areas across the country. Major network reinforcement will be required. These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid, this will have a 	<p>The Council’s Infrastructure Delivery Plan (EB69) has assessed the impacts of growth within Stroud District upon electricity supplies. The IDP acknowledges electric heating is highly unlikely to be able to be accommodated by the existing electricity network without requiring significant upgrades. Therefore, it is recommended that local opportunities to decarbonise are fully utilised to reduce demand on the grid. These include looking to increase the efficiency of properties to reduce demands and localised power generation, both of which</p>



Delivery Policy ES1 - Sustainable construction and design		
	<p>significant impact and potentially jeopardise future housing delivery. It is noted that the Council’s final viability assessment appraisals exclude costs for EVCPs. These costs should be included as EVCPs will be required by Delivery Policy ES1.</p>	<p>are reflected in the SDLP policies ES1 and ES2.</p> <p>The Council’s Viability Assessment (May 2021) (EB70) has modelled the expected costs of this policy when assessing overall viability. It is acknowledged that costs and values vary over time. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p>
	<ul style="list-style-type: none"> Should not require all residential development proposals to meet or exceed the standards set out by the Home Quality Mark, or equivalent. The Home Quality Mark has no status beyond that of best practice guide. The use of such guidance should remain voluntary. The reference to the Home Quality Mark in policy wording should not convey development plan status to a document. It is not reasonable or justified for residential development proposals to be required to meet or exceed these standards. This reference should be removed. 	<p>National planning practice guidance confirms that “In their development plan policies, local planning authorities can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations..” (Paragraph: 012 Reference ID: 6-012-20190315)</p> <p>There is evidence (see above) that the UK is not delivering progress at the rate required to meet its obligations and further actions are required at a local level.</p> <p>The policy provides for the use of other equivalent best practice standards.</p>
	Policy wording modifications:	
	<ul style="list-style-type: none"> This policy is unnecessary because it is superseded by the Future Homes Standard. Delivery Policy ES1 should be deleted. Delivery Policy ES1 (Bullet Point 8) is unnecessary because of the Government’s proposed introduction of Part S of the Building Regulations. The policy should be deleted. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
BBA Architects for Vistry Group (912)	<ul style="list-style-type: none"> Sustainable Construction and design are integral to Vistry’s operations and are therefore supportive of a move to greater energy efficiency generally in the construction industry and national net-zero carbon targets. However, there needs to be nationally consistent set of standards and programme. The Government has set out how targets to achieve net zero carbon can be delivered through the Future 	<p>National planning practice guidance confirms that “In their development plan policies, local planning authorities can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations..” (Paragraph: 012 Reference ID: 6-012-20190315)</p> <p>There is evidence (see above) that the UK is not delivering progress at the rate required to meet its obligations and further actions are required at a local</p>



Delivery Policy ES1 - Sustainable construction and design		
	Homes Standard. There are obvious challenges to achieving this, and the best opportunity for success is to ensure a standardised approach nationally set through the Building Regulations. Policy ES1 should therefore be deleted.	level.
	<ul style="list-style-type: none"> There is no justification for residual emissions offset through payment to a Stroud District carbon offset fund nor for residential development proposals to meet or exceed the standards set out by the Home Quality Mark, or equivalent. The Home Quality Mark has no status beyond that of best practice guide. 	<p>The Council recognises within policy ES1 that it will not always be possible to achieve zero emissions on-site through energy efficiency.</p> <p>Where the zero-carbon target cannot be fully achieved on-site the shortfall should be required to be off-set in line with current practice, following the approach set by the London Plan. Further guidance on how the Council’s carbon offset regime will operate should be published in due course.</p>
	Policy wording modifications:	
	<ul style="list-style-type: none"> Policy ES1 should be deleted 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
The Planning Bureau for McCarthy and Stone retirement Lifestyles Ltd (675)	<ul style="list-style-type: none"> The Council’s commitment to meeting both its and the UK Government’s target of net zero carbon emissions by 2030 is commendable. 1.Achieve Net Zero Carbon. This sub-clause of Policy ES1 advises that there is a requirement for new development to achieve a minimum of a 35% reduction in emissions over Part L (2013). A minimum of 10% of the reduction in emissions should be achieved using building fabric and energy efficiencies measure alone. Both the respondents lean toward the use of ‘fabric first’ approaches in reducing energy emissions. It would surely be better for a developer to utilize the method that is best suited to a particular site rather than adhere to an arbitrary ratio. 	<p>Policy ES1 targets a fabric first approach in line with the energy hierarchy, to minimise the energy demand of the building through optimal choices in respect of design, materials and construction.</p> <p>This approach will minimise heating costs for future residents at a time of very rapidly rising energy bills, provide comfort and health benefits for occupants and minimise the need for further costly energy efficiency retrofitting work in the future.</p> <p>Homes built now which aren't zero carbon will require much more expensive retrofitting in the future, with the costs met by either home owners or the public purse. The Committee on Climate Change advise that designing in these features from the start is around one-fifth of the cost of retrofitting to the same quality and standard. (CCC – Housing Fit for The Future.)</p>
	<ul style="list-style-type: none"> 7. Cycle Parking. Sheltered housing and in particular Extra Care accommodation, is used by older people who tend to be frail and are likely to have mobility difficulties. Older people would be unlikely to require extra care accommodation if cycling regularly. A 	The requirement in criteria is to provide cycle parking in accordance with Local Plan standards. Cycle parking standards are set out in Appendix C which states, for sheltered housing, the standard of 0.15 per employee. In other words, the standard relates to employees not to residents.



Delivery Policy ES1 - Sustainable construction and design		
	<p>survey of 242 McCarthy and Stone Retirement Living units showed only 7 bicycles owned by residents in these apartments. This is an ownership rate of 0.0289 cycles per apartment or 1 cycle per 35 apartments. The requirement for cycle spaces in specialist older persons’ housing is inappropriate and unnecessary. Companies provide an internal mobility scooter store for use by residents and where a bike could also be stored as a far more relevant requirement.</p>	
	<ul style="list-style-type: none"> 8. Electric Vehicles. The provision of a quota of charging points runs a significant risk of obsolescence. The provision of cabling to car parking spaces to enable future installation of charging point in line with the wishes of residents is a more practical measure. 	<p>There is evidence (see above) that the UK is not delivering progress at the rate required to meet its obligations and further actions are required at a local level.</p>
	<p>Policy wording modifications:</p>	
	<ul style="list-style-type: none"> That the 35% reduction below the Building Regulations ‘Part L’ Target Emission Rate is achieved by a method the developer deems most appropriate. To require the provision of cabling to off-street parking spaces to enable future installation of electric vehicle charging points in line with demand from residents. For cycle parking in Extra Care & Sheltered housing developments to be limited to provision for staff and visitors. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
<p>Comment</p>		
<p>Gloucestershire Wildlife Trust (202)</p>	<p>Policy wording modifications:</p>	
	<ul style="list-style-type: none"> Want connection to CP5 and the requirement for strategic allocations to design GI to Building with Nature or equivalent standards. 	<p>The policies of the SDLP relating to strategic allocations includes references to Building with Nature standards. Policy ES1 applies to all development. The SDLP should be read as a whole and should not include unnecessary repetition or cross-reference.</p>



Delivery Policy ES1 - Sustainable construction and design		
<p>Savills (UK) Limited for The Berkeley Estate (878)</p>	<ul style="list-style-type: none"> To become carbon neutral is more ambitious than national aspirations to achieve net-zero greenhouse gas emissions by 2030. Building to increased standards will lead to higher costs and SDC should carefully consider this. There is little evidence prepared to support this commitment. There is potential to constrain planned development across the district leading to housing land supply issues with an associated risk of speculative residential development coming forward. Need to factor into viability appraisals for strategic allocations. 	<p>National planning practice guidance confirms that “In their development plan policies, local planning authorities can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations..” (Paragraph: 012 Reference ID: 6-012-20190315)</p> <p>There is evidence (see above) that the UK is not delivering progress at the rate required to meet its obligations and further actions are required at a local level.</p> <p>The Council’s Viability Assessment (May 2021) (EB70) has modelled the expected costs of this policy when assessing overall viability. It is acknowledged that costs and values vary over time. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p>
<p>Policy wording modifications: None</p>		
<p>McLoughlin Planning for SevenHomes (880)</p>	<ul style="list-style-type: none"> The policy sets out unnecessary repetition of Zero Carbon objectives which have been set out elsewhere in the plan and is considered unsound because it is contrary to national guidance. Position is supported by The Written Ministerial Statement of 25 March 2015 and the Deregulation Bill 2015 receiving Royal Assent: “local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.” Broadly agree with the Council’s objectives, but policy requirements are incompatible with the Government approach. It introduces local standards, Eg: Zero Carbon achievement has yet to be set by the Government and Building Regulations will move at a faster pace 	<p>The 2015 Written Ministerial statement (WMS) should not be read in isolation and has been superseded by subsequent events.</p> <p>The proposed removal of local authorities’ powers to set standards set out in the WMS was to prepare the way for the national zero carbon homes regime, which was shortly to come into force shortly after. This would have secured zero carbon requirements through the building regulations, but this regime was abandoned in 2015 shortly before its expected introduction.</p> <p>The 2018 consultation response that accompanied the revised National Planning Policy Framework (NPPF) confirmed “the Framework does not prevent local authorities from using their existing powers under the Planning and Energy Act 2008 or other legislation where applicable to set higher ambition. In particular, local authorities are not restricted in their ability to require energy efficiency standards above Building Regulations.”</p> <p>The government’s response to the Future Homes Standard (para 2.33 – 2.34) in 2021 again explicitly confirms that local planning authorities retain these powers: “The Planning and Energy Act 2008 was amended in 2015 to provide Government with powers to stop local planning authorities from being able to</p>



Delivery Policy ES1 - Sustainable construction and design		
	<p>than Plan standards.</p>	<p>exceed the minimum energy efficiency requirements of the Building Regulations, but this amendment has not been commenced.... At present, local planning authorities may include policies in their local plans which require developers to comply with energy efficiency standards for new homes that exceed the minimum requirements of the Building Regulations.”</p> <p>This remains the current position.</p>
	<ul style="list-style-type: none"> The reference to a Carbon Offset Fund is not explained or relevant to proposals to meets the tests in the Framework. There is no explanation as to how “residual emissions” will be assessed. 	<p>The Council recognises within policy ES1 that it will not always be possible to achieve zero emissions on-site through energy efficiency.</p> <p>Where the zero-carbon target cannot be fully achieved on-site the shortfall should be required to be off-set in line with current practice, following the approach set by the London Plan. Further guidance on how the Council’s carbon offset regime will operate should be published in due course.</p>
	<ul style="list-style-type: none"> Use of the Home Quality Mark – this is not a Government approved standard and should be removed from the Plan. 	<p>There is evidence (see above) that the UK is not delivering progress at the rate required to meet its obligations and further actions are required at a local level. The policy provides for the use of other equivalent best practice standards.</p>
Policy wording modifications:		
	<ul style="list-style-type: none"> Use of the Home Quality Mark – this is not a Government approved standard and should be removed from the Plan. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
Savills (UK) Limited for L & Q Estates (913)	<ul style="list-style-type: none"> Policy ES1 contains a large number of detailed measures to be required from new residential development proposals. L&QE actively responding to the challenge by delivering housing above current building regulation standard, and have committed to establishing an L&Q design standard to address the emerging Future Homes Standard. However, this is balanced against viability alongside the feasibility and practicalities of delivery in a timely manner. The eSDLP references the Future Homes Standard, and indicates that it is seeking to accelerate the move to zero carbon development in advance of this. The 	<p>There is evidence (see above) that the UK is not delivering progress at the rate required to meet its obligations and further actions are required at a local level.</p> <p>The Council’s Viability Assessment (May 2021) (EB70) has modelled the expected costs of this policy when assessing overall viability. It is acknowledged that costs and values vary over time. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p>



Delivery Policy ES1 - Sustainable construction and design		
	<p>national evidence references the need for a staged approach to changing the Building Regulations. In seeking to set a higher standard at an early point, SDC will need to demonstrate how barriers will be overcome to ensure that they do not compromise the delivery strategy. Even the viability evidence, concludes that this draft policy requirement is not viable, and is unsound. This is implicit in NPPF paragraphs 16(b), 34 and 57 all of which relate to the need for Local Plans to be deliverable (at the point of adoption) and have regard to viability. The National Planning Policy Framework Paragraph Reference ID: 6-009-20150327 is particularly relevant.</p>	
<p>Policy wording modifications: None</p>		
<p>Rapleys LLP for Crest Nicholson Land Partnerships) (897)</p>	<ul style="list-style-type: none"> The draft policy should be consistent with the national policy approach that is set out currently by the Written Ministerial Statement from March 2015. There is no clearly evidenced locally occurring need, justified by locally specific data and where the impact on viability has been considered. This position is reinforced by NPPG, paragraphs 007 Reference ID: 56-007-20150327; and 020 Reference ID: 56-020-20150327. Ambitions must be in step with the national agenda and fully justified with a full assessment of the potential impacts on delivery of the Local Plan strategy, the viability of which will be affected by any application of locally specific standards. 	<p>The 2015 Written Ministerial statement (WMS) should not be read in isolation and has been superseded by subsequent events.</p> <p>The proposed removal of local authorities’ powers to set standards set out in the WMS was to prepare the way for the national zero carbon homes regime, which was shortly to come into force shortly after. This would have secured zero carbon requirements through the building regulations, but this regime was abandoned in 2015 shortly before its expected introduction.</p> <p>The 2018 consultation response that accompanied the revised National Planning Policy Framework (NPPF) confirmed “the Framework does not prevent local authorities from using their existing powers under the Planning and Energy Act 2008 or other legislation where applicable to set higher ambition. In particular, local authorities are not restricted in their ability to require energy efficiency standards above Building Regulations.”</p> <p>The government’s response to the Future Homes Standard (para 2.33 – 2.34) in 2021 again explicitly confirms that local planning authorities retain these powers: “The Planning and Energy Act 2008 was amended in 2015 to provide Government with powers to stop local planning authorities from being able to</p>



Delivery Policy ES1 - Sustainable construction and design		
		<p>exceed the minimum energy efficiency requirements of the Building Regulations, but this amendment has not been commenced.... At present, local planning authorities may include policies in their local plans which require developers to comply with energy efficiency standards for new homes that exceed the minimum requirements of the Building Regulations.”</p> <p>This remains the current position.</p>
Policy wording modifications: None		
<p>McLoughlin Planning for Avant Homes (839)</p>	<ul style="list-style-type: none"> The policy sets out unnecessary repetition of Zero Carbon objectives which have been set out elsewhere in the Plan and is considered unsound because it is contrary to national guidance. The position is supported by The Written Ministerial Statement of 25 March 2015 and from the date of the Deregulation Bill 2015 receiving Royal Assent. Agree with the general thrust of the Council’s objectives, but the requirements of the policy are incompatible with the Government led approach in that it introduces effectively local standards. for example: 	<p>The 2015 Written Ministerial statement (WMS) should not be read in isolation and has been superseded by subsequent events.</p> <p>The proposed removal of local authorities’ powers to set standards set out in the WMS was to prepare the way for the national zero carbon homes regime, which was shortly to come into force shortly after. This would have secured zero carbon requirements through the building regulations, but this regime was abandoned in 2015 shortly before its expected introduction.</p> <p>The 2018 consultation response that accompanied the revised National Planning Policy Framework (NPPF) confirmed “the Framework does not prevent local authorities from using their existing powers under the Planning and Energy Act 2008 or other legislation where applicable to set higher ambition. In particular, local authorities are not restricted in their ability to require energy efficiency standards above Building Regulations.”</p> <p>The government’s response to the Future Homes Standard (para 2.33 – 2.34) in 2021 again explicitly confirms that local planning authorities retain these powers:</p> <p>“The Planning and Energy Act 2008 was amended in 2015 to provide Government with powers to stop local planning authorities from being able to exceed the minimum energy efficiency requirements of the Building Regulations, but this amendment has not been commenced.... At present, local planning authorities may include policies in their local plans which require developers to comply with energy efficiency standards for new homes that exceed the minimum requirements of the Building Regulations.”</p> <p>This remains the current position.</p>



Delivery Policy ES1 - Sustainable construction and design		
	<ul style="list-style-type: none"> The reference to a Carbon Offset Fund is not explained or relevant to proposals to meets the tests in the Framework. There is no explanation as to how “residual emissions” will be assessed. 	<p>The Council recognises within policy ES1 that it will not always be possible to achieve zero emissions on-site through energy efficiency.</p> <p>Where the zero-carbon target cannot be fully achieved on-site the shortfall should be required to be off-set in line with current practice, following the approach set by the London Plan. Further guidance on how the Council’s carbon offset regime will operate should be published in due course.</p>
	<ul style="list-style-type: none"> Use of the Home Quality Mark – this is not a Government approved standard and should be removed from the Plan. 	<p>There is evidence (see above) that the UK is not delivering progress at the rate required to meet its obligations and further actions are required at a local level. The policy provides for the use of other equivalent best practice standards.</p>
Policy wording modifications:		
	<ul style="list-style-type: none"> Use of the Home Quality Mark – this is not a Government approved standard and should be removed from the Plan. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> The policy sets out unnecessary repetition of Zero Carbon objectives which have been set out elsewhere in the Plan and is considered unsound because it is contrary to national guidance. The position is supported by The Written Ministerial Statement of 25 March 2015 and from the date of the Deregulation Bill 2015 receiving Royal Assent. Agree with the general thrust of the Council’s objectives, but the requirements of the policy are incompatible with the Government led approach in that it introduces effectively local standards. for example: 	<p>The 2015 Written Ministerial statement (WMS) should not be read in isolation and has been superseded by subsequent events.</p> <p>The proposed removal of local authorities’ powers to set standards set out in the WMS was to prepare the way for the national zero carbon homes regime, which was shortly to come into force shortly after. This would have secured zero carbon requirements through the building regulations, but this regime was abandoned in 2015 shortly before its expected introduction.</p> <p>The 2018 consultation response that accompanied the revised National Planning Policy Framework (NPPF) confirmed “the Framework does not prevent local authorities from using their existing powers under the Planning and Energy Act 2008 or other legislation where applicable to set higher ambition. In particular, local authorities are not restricted in their ability to require energy efficiency standards above Building Regulations.”</p> <p>The government’s response to the Future Homes Standard (para 2.33 – 2.34) in 2021 again explicitly confirms that local planning authorities retain these powers: “The Planning and Energy Act 2008 was amended in 2015 to provide Government with powers to stop local planning authorities from being able to</p>



Delivery Policy ES1 - Sustainable construction and design		
		<p>exceed the minimum energy efficiency requirements of the Building Regulations, but this amendment has not been commenced.... At present, local planning authorities may include policies in their local plans which require developers to comply with energy efficiency standards for new homes that exceed the minimum requirements of the Building Regulations.”</p> <p>This remains the current position.</p>
	<ul style="list-style-type: none"> The reference to a Carbon Offset Fund is not explained or relevant to proposals to meets the tests in the Framework. There is no explanation as to how “residual emissions” will be assessed. 	<p>The Council recognises within policy ES1 that it will not always be possible to achieve zero emissions on-site through energy efficiency.</p> <p>Where the zero-carbon target cannot be fully achieved on-site the shortfall should be required to be off-set in line with current practice, following the approach set by the London Plan. Further guidance on how the Council’s carbon offset regime will operate should be published in due course.</p>
	<ul style="list-style-type: none"> Use of the Home Quality Mark – this is not a Government approved standard and should be removed from the Plan. 	<p>There is evidence (see above) that the UK is not delivering progress at the rate required to meet its obligations and further actions are required at a local level. The policy provides for the use of other equivalent best practice standards.</p>
Policy wording modifications:		
	<ul style="list-style-type: none"> Use of the Home Quality Mark – this is not a Government approved standard and should be removed from the Plan. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
Black Box for Taylor Wimpey UK Limited (936)	<ul style="list-style-type: none"> These representations relate to site G2: Land at Whaddon. The objectives of Policy ES1 are supported with net zero carbon in response to climate change. The policy seeks an overall minimum 35% reduction in emissions over Part L2013 Building Regulations and, a minimum 10% reduction in emissions in homes through fabric energy efficiency improvement, and residual emissions offset through a carbon footprint calculator. The policy risks becoming out of date quickly with the emergence of new building regulations. The revised document proposes to increase the need to reduce carbon output from 	<p>National planning practice guidance confirms that “In their development plan policies, local planning authorities can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations..”</p> <p>(Paragraph: 012 Reference ID: 6-012-20190315)</p> <p>There is evidence (see above) that the UK is not delivering progress at the rate required to meet its obligations and further actions are required at a local level.</p> <p>Planning legislation and policy guidance provides for mechanisms where existing local plan policy is subsequently overtaken by changes to national policy, through the use of other material consideration and plan reviews. At</p>



Delivery Policy ES1 - Sustainable construction and design		
	<p> dwellings. The changes proposed to Part L recommend a 'fabric efficiency' led approach to carbon reduction. The policy should be amended to align with Government proposals.</p>	<p>the current time, the policy requirements of ES1 are considered necessary and are unlikely to become out of date quickly.</p>
	<ul style="list-style-type: none"> At the Regulation 18 consultation stage, representations requested clarification on the methodology and viability evidence in relation to the Stroud District carbon offset fund It remains an assumption that the Council will publish information in due course and undertake separate consultation on how such contributions are calculated. 	<p>Where the zero-carbon target cannot be fully achieved on-site the shortfall should be required to be off-set in line with current practice, following the approach set by the London Plan. Further guidance on how the Council's carbon offset regime will operate should be published in due course.</p>
	Policy wording modifications:	
	<ul style="list-style-type: none"> The policy should be amended to align with emerging building regulations with 31% reduction above Part L 2013. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		



Delivery Policy ES2 - Renewable or low carbon energy generation				
Number of representations: 6		Support: 3	Object: 1	Comment: 2
Stakeholders	Comments		Stroud District Council Response	
Support				
No response received		Policy wording modifications: None		
Object				
Natural England (864)	<p>The Cotswolds Conservation Board has drawn to our attention the following matters relating to the policy's formulation in respect of the Cotswolds Area of Outstanding Natural Beauty (AONB):</p> <ul style="list-style-type: none"> The assessment methodology and resulting 'suitable areas' mapping (Appx 8b) has not taken account of relevant Cotswolds AONB references e.g. Cotswolds AONB Management Plan (2018-23), AONB Landscape Character Assessment and AONB Landscape Strategy and Guidelines. The landscape character assessment approach omits consideration of impacts on visual amenity and cumulative impacts. 		<p>The Council has prepared a Statement of Common Ground with Natural England, which has acknowledged this objection and where "both parties are committed to working together to resolve this soundness matter and will continue dialogue accordingly." (Duty to Cooperate Statement (EB3).</p>	
	<ul style="list-style-type: none"> Differences exist in the Landscape Character Types in the AONB LCA and that used by the Council. There is a risk that sites for wind and solar energy developments would be likely to constitute 'major development' and not comply with para 172 of the NPPF. Smaller scale size categorisation for both wind and solar energy proposals within the AONB or its setting is likely to be needed to tackle these issues. 		<p>The Council has prepared a Statement of Common Ground with Natural England, which has acknowledged this objection and where "both parties are committed to working together to resolve this soundness matter and will continue dialogue accordingly." (Duty to Cooperate Statement (EB3).</p>	
	<p>Policy wording modifications:</p> <ul style="list-style-type: none"> A review of: <ul style="list-style-type: none"> (i) the landscape sensitivity mapping and associated assessments, specifically taking account of the Cotswold AONB reference documents described above and the relevant Landscape Character Types. 		<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>	



Delivery Policy ES2 - Renewable or low carbon energy generation		
	(ii) The 'suitable areas' mapping to reflect the outcomes from (i)	
Comment		
RCA Regeneration Ltd (861) for Land Development and Estates Ltd	<ul style="list-style-type: none"> Point (d) is a difficult to implement and difficult to identify a direct benefit to local communities. Often, the benefit is to the wider grid capacity and national targets, and these developments have national significance. There is a missed opportunity to directly reference grid capacity and energy storage. 	The NPPF states that "Local planning authorities should support community-led initiatives for renewable and low carbon energy" (NPPF, para. 156) and renewable energy can have positive effects on local communities as set out in the SDLP para.6.15. Consequently, it is right to include a criterion which considers the benefits to the community. However, the criterion is not a requirement. Grid capacity and energy storage opportunities will be considered as part of criterion a/ to decarbonise the energy system.
Policy wording modifications: None		
RCA Regeneration Ltd (877) for Piper Homes	<ul style="list-style-type: none"> Point (d) is a difficult to implement and difficult to identify a direct benefit to local communities. Often, the benefit is to the wider grid capacity and national targets, and these developments have national significance. There is a missed opportunity to directly reference grid capacity and energy storage. 	The NPPF states that "Local planning authorities should support community-led initiatives for renewable and low carbon energy" (NPPF, para. 156) and renewable energy can have positive effects on local communities as set out in the SDLP para.6.15. Consequently, it is right to include a criterion which considers the benefits to the community. However, the criterion is not a requirement. Grid capacity and energy storage opportunities will be considered as part of criterion a/ to decarbonise the energy system.
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
No responses received		
Policy wording modifications: None		

Delivery Policy DES3 – Heat Supply				
Number of representations: 15		Support: 4	Object: 7	Comment: 4
Stakeholders	Comments		Stroud District Council Response	
Support				
The Canal & River Trust (496)	<ul style="list-style-type: none"> Reference be made within supporting text to possible use of canal water to provide carbon zero heating and cooling resource (relevant to several potential housing allocations). 		Support noted. There are a number of potential ways of delivering low or no carbon heating in the District. Whilst this is useful information it is not proposed to set out all the ways that this could be achieved.	
	Policy wording modifications:			
	<ul style="list-style-type: none"> Reference be made within supporting text to possible use of canal water to provide carbon zero heating and cooling resource (relevant to several potential housing allocations). 		All suggested policy wording modifications will be considered by the Inspectors at the EIP.	
Blue Fox Planning Limited for Persimmon Homes Severn Valley (928)	<ul style="list-style-type: none"> PHSV support providing heat from sustainable sources. The policy indicates provision where viable. The feasibility should be a consideration as to whether it is provided on site, with potential environmental limitations restricting sustainable heating systems. 		Support noted. Viability is a broad assessment which includes matters of practicality and feasibility.	
	Policy wording modifications:			
	<ul style="list-style-type: none"> In order to be more effective and justified, PHSV suggest the policy wording should be revised to: “Development proposals should include a communal low-temperature heating system where viable and feasible”. 		All suggested policy wording modifications will be considered by the Inspectors at the EIP.	
Object				
Savills for L&Q Estates (913)	<ul style="list-style-type: none"> Object to the establishment of a development management approach which requires viability testing for a communal heat supply. Evidence is required to demonstrate that this is viable at the outset of the local plan. The burden of evidence should not be transferred to the applicant. 		Communal heating systems can be viable but it is difficult at the Local Plan level to determine that for all forms of development and all site types. The Viability Assessment (EB70) assesses potential costs, but acknowledges that the cost will vary from scheme to scheme, and that this will depend, in part, on the availability of an existing heat source. As the industry gets ready for the phasing out of gas boilers in 2025 it is anticipated that there will be a rapid change in viability in the short to medium term. Ahead of the EIP, the Council	

Delivery Policy DES3 – Heat Supply		
		is updating its infrastructure and viability evidence base and documentation. This will be published In due course.
	<ul style="list-style-type: none"> With future proofing, it unclear what this requirement means in practice, and what the design implications (and associated costs) would be. 	The Viability Assessment (EB70) assesses potential costs, but acknowledges that the cost will vary from scheme to scheme, and that this will depend, in part, on the availability of an existing heat source. The Government is keen on promoting heat networks, including zoning for networks and has recently launched a Green Heat Network Fund to support their rollout. As the industry gets ready for the phasing out of gas boilers in 2025 it is anticipated that there will be a rapid change in viability in the short to medium term.
	<ul style="list-style-type: none"> In-principle concern that a communal heating system is preferable – indeed, it is not always the most environmentally or financially efficient way of heating a new development. There is limited regulation or transparency, and can result in future residents being liable for significant charging above ‘market’ energy. There are no guarantees that energy used is any less polluting than the national grid. 	The Government is keen on promoting heat networks, including zoning for networks and has recently launched a Green Heat Network Fund to support their rollout. Ofgem has been appointed as heat network regulators and will ensure a regulated service for customers.
Policy wording modifications: None		
RCA Regeneration Ltd for Piper Homes (877)	<ul style="list-style-type: none"> Support principle but object to wording as district heating is only viable on large strategic sites. This policy would require almost all small and medium house builders to demonstrate the viability issues creating unnecessary delays. 	The policy makes clear that where a local heat network is not currently in existence, the development would only be required to be designed to make connection in the future cost effective.
Policy wording modifications: None		
Home Builders Federation (HBF) (892)	It is acknowledged that communal heat networks are towards decarbonising heat, however the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. As 2050 approaches, meeting the climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat	The Government is keen on promoting heat networks, including zoning for networks and has recently launched a Green Heat Network Fund to support their rollout. As the industry gets ready for the phasing out of gas boilers in 2025 it is anticipated that there will be a rapid change in viability in the short to medium term.



Delivery Policy DES3 – Heat Supply		
	<p>recovery. At the moment heat network projects do not install such technologies because of the up-front capital cost. The Council should be aware that for the foreseeable future, it will remain uneconomic for most heat networks to install low-carbon technologies.</p>	
	<ul style="list-style-type: none"> Some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong. The monopolistic nature of heat networks means price regulation is required to protect domestic consumers. There are proposals for Ofgem oversight, enforcement and pricing arrangements for all domestic heat network consumers. These concerns are not reflected in the Council’s proposals for communal heat networks. 	<p>Ofgem has been appointed as heat network regulators and will ensure a regulated service for customers.</p>



Delivery Policy DES3 – Heat Supply		
	<ul style="list-style-type: none"> Final viability assessment appraisals only include costs for Future Homes Standard Option 2 of £4,847 per dwelling, additional costs associated with the delivery of heat networks are excluded from the viability assessment (para 8.90), which are estimated at £5,000 per dwelling 	<p>The Viability Assessment (EB70) assesses potential costs, but acknowledges that the cost will vary from scheme to scheme, and that this will depend, in part, on the availability of an existing heat source.</p> <p>Additional costs may be in the range of £3,000 to £7,000 per unit, which is supported by the limited published data. The Government is keen on promoting heat networks, including zoning for networks and has recently launched a Green Heat Network Fund to support their rollout. As the industry gets ready for the phasing out of gas boilers in 2025 it is anticipated that there will be a rapid change in viability in the short to medium term. Ahead of the EIP, the Council is updating its infrastructure and viability evidence base and documentation. This will be published In due course.</p>
Policy wording modifications:		
	<ul style="list-style-type: none"> Delivery Policy DES3 is impractical and unviable, and should be deleted. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> Object to ensuring that developments are future proofed with local heat networks. The end of gas boilers in 2025 means that developers will already be considering the need for heat generation in new homes. If the policy was applied it would place an unnecessary burden on the PS25 site as the allocation to the north has not been designed to that standard. 	The Government is keen on promoting heat networks, including zoning for networks and has recently launched a Green Heat Network Fund to support their rollout. As the industry gets ready for the phasing out of gas boilers in 2025 it is anticipated that there will be a rapid change in viability in the short to medium term. The policy makes clear that where a local heat network is not currently in existence, the development would only be required to be designed to make connection in the future cost effective.
Policy wording modifications: None		
Minchinhampton Parish Council (504)	<ul style="list-style-type: none"> Heat pumps require very specific energy efficient environments in order to operate effectively. The development industry remains in its infancy in satisfying all of the issues. Also difficult to retrofit expectation into existing buildings. This is very important in relation to conservation areas and most housing stock built before 1960 (about 70% of total dwelling supply). Acoustic damage will occur with noise generated by a housing estate equipped with heat pumps. 	The Government is keen on promoting heat networks, including zoning for networks and has recently launched a Green Heat Network Fund to support their rollout. As the industry gets ready for the phasing out of gas boilers in 2025 it is anticipated that there will be a rapid change in viability in the short to medium term. The policy makes clear that where a local heat network is not currently in existence, the development would only be required to be designed to make connection in the future cost effective.
	<ul style="list-style-type: none"> The basic construction of the housing stock will have 	An energy efficient building does not mean that it cannot be designed in a



Delivery Policy DES3 – Heat Supply		
	to be Code 5 or greater in insulated efficiency. This can only be achieved by embracing industrialised building systems which do not match house builder development expectations. Bricks and mortar solutions are not absolutely compatible and brings implications in terms of development appearance.	way which is sympathetic to the character of an area. Housebuilder expectations will change as global climate change policy requirements become established.
Policy wording modifications: None		
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> Object to ensuring that developments are future proofed with local heat networks. The end of gas boilers in 2025 means that developers will already be considering the need for heat generation in new homes. 	The policy makes clear that where a local heat network is not currently in existence, the development would only be required to be designed to make connection in the future cost effective.
Policy wording modifications: None		
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> Object to ensuring that developments are future proofed with local heat networks. The end of gas boilers in 2025 means that developers will already be considering the need for heat generation in new homes. 	The policy makes clear that where a local heat network is not currently in existence, the development would only be required to be designed to make connection in the future cost effective.
Policy wording modifications: None		
Comment		
RCA Regeneration Ltd for Land Development and Estates Ltd (861)	<ul style="list-style-type: none"> Agree with the principle of this policy but object as district heating is only viable on large strategic sites. This policy would require almost all small and medium housebuilders to demonstrate the viability issues. 	The policy makes clear that where a local heat network is not currently in existence, the development would only be required to be designed to make connection in the future cost effective.
Policy wording modifications: None		
Black Box Planning for Taylor Wimpey UK Limited (936)	<ul style="list-style-type: none"> Taylor Wimpey (TW) have majority control over land (130 ha) at Whaddon (G2), with neighbouring promoters. All parties have been working jointly to ensure a comprehensive approach to the masterplanning, deliverability and its associated infrastructure. DES3 should not require provision of infrastructure on development schemes to connect 	The Government is keen on promoting heat networks, including zoning for networks and has recently launched a Green Heat Network Fund to support their rollout. As the industry gets ready for the phasing out of gas boilers in 2025 it is anticipated that there will be a rapid change in viability in the short to medium term. The policy makes clear that where a local heat network is not currently in existence, the development would only be required to be designed to make connection in the future cost effective.



Delivery Policy DES3 – Heat Supply		
	<p>to ‘planned’ heat networks, including connections ‘currently unviable’ when potentially there is no prospect of the plant ever being utilised. Such practice presents viability and uncertainty for development proposals.</p>	
	<p>Policy wording modifications:</p>	
	<ul style="list-style-type: none"> The final paragraph should be deleted and replaced with “Where a local heat network is planned, local development proposals will be encouraged to explore opportunities for connection to be made. Where certainty regarding a viable connection in the future to a planned local heat network can be established, the development should be designed to allow for connection and supply at a later date.” 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
BBA Architects for Vistry Group (912)	<ul style="list-style-type: none"> Communal heat networks are only one mechanism of many to achieve net zero carbon. The predominant technology for district-sized communal heating networks is gas combined heat and power plants. This is at odds with the requirement to transition away from gas-fired networks to renewable or low carbon alternatives. The costs of low carbon heat networks are currently prohibitive. 	<p>The Government is keen on promoting heat networks, including zoning for networks and has recently launched a Green Heat Network Fund to support their rollout. As the industry gets ready for the phasing out of gas boilers in 2025 it is anticipated that there will be a rapid change in viability in the short to medium term. The policy makes clear that where a local heat network is not currently in existence, the development would only be required to be designed to make connection in the future cost effective.</p>
	<p>Policy wording modifications:</p>	
	<ul style="list-style-type: none"> Delete Policy DES3 as unviable, undeliverable and not justified. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
RPS Group for Stroud Corporation NV (917)	<ul style="list-style-type: none"> The delivery of a communal heating system is subject to site constraints, the availability of connection to a local heat network, and viability. This policy should allow a greater flexibility in relation to the installation of a communal heating system. 	<p>The policy is flexible, because if it is not viable or if a local heat network is not currently in existence, the development would only be required to be designed to make connection in the future cost effective.</p>
	<p>Policy wording modifications:</p>	
	<ul style="list-style-type: none"> This policy should allow a greater flexibility in relation to the installation of a communal heating system 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>



Delivery Policy DES3 – Heat Supply		
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		



Delivery Policy ES3 - Maintaining quality of life within our environmental limits				
Number of representations: 10		Support: 3	Object: 1	Comment: 6
Stakeholders	Comments		Stroud District Council Response	
Support				
No comments received	Policy wording modifications: None			
Object				
No comments received	Policy wording modifications: None			
Comment				
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> Policy is too broad in the matters which it covers and could be used to oppose housing allocations as it is subjective. In terms of loss of healthy soils, or best and most versatile agricultural land, what level of loss is unacceptable? How does this balance against the housing requirements of the plan and need for affordable housing? 		<p>This policy appears in the Adopted Local Plan (2015) ES3. The wording has been updated to reflect the latest guidance and best practice.</p> <p>In the SA allocation sites that are on greenfield land classed as high quality agricultural land (Grades 1, 2 or 3a) are rated red, as having a significant negative (--) effect, for efficiency in land use and protection of soil quality regardless of size. Sites are allocated having regard to Sustainability Appraisal across 17 SA objectives; this is a balanced judgement taking all objectives into consideration, SA Report Appendix 4 (CD3b). Otherwise each planning application will be considered against the Local Plan as a whole and on its own merits taking into account any other material considerations to reach a carefully weighed planning decision to help secure sustainable growth within environmental limits.</p>	
	<ul style="list-style-type: none"> Contrary to the NPPF, which requires that the loss of best and most versatile land is only "considered". 		<p>Loss of best and most versatile land is one of a number of policy and material considerations to be assessed at the planning application stage. Paragraph 6.31 sets out the consideration need.</p>	
Policy wording modifications: None				
Natural England (864)	<ul style="list-style-type: none"> Notes the policy's inclusion of the 'best and most and versatile' land theme at subsection 8 with the economic and other benefits it offers. With the plan's proposals for new settlements on green field land would welcome explanatory information about the soil resource and the steps and considerations that 		<p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection. On-site specifics; including soil resources and mitigation, should be addressed at the masterplan/ planning application stage.</p>	



Delivery Policy ES3 - Maintaining quality of life within our environmental limits		
	<p>need to be incorporated into such development.</p> <ul style="list-style-type: none"> The plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process. Soils of high environmental value (e.g. wetland and carbon stores such as peatland) should also be considered. Further guidance for protecting soils both during and following development is available in Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. The aim is to achieve positive outcomes such as cost savings, successful landscaping and enhanced amenity whilst maintaining a healthy natural environment, 	<p>The Council has prepared a Statement of Common Ground with Natural England where both parties are committed to working together and will continue dialogue accordingly. (Duty to Cooperate Statement (EB3). The Council will consider modifications, if necessary.</p>
	Policy wording modifications:	
	<ul style="list-style-type: none"> Inclusion of reference to suitable context information together with explicit reference to the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> Policy is too broad in the matters which it covers and could be used to oppose housing allocations as it is subjective. 	<p>This policy appears in the Adopted Local Plan (2015) ES3. The wording has been updated to reflect the latest guidance and best practice. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection. On-site specifics; sites are allocated having regard to Sustainability Appraisal across 17 SA objectives; this is a balanced judgement taking all objectives into consideration, SA Report Appendix 4 (CD3b) includes soil resources and mitigation and this should be addressed at the masterplan/ planning application stage.</p>
	<ul style="list-style-type: none"> In terms of loss of healthy soils, or best and most versatile agricultural land, what level of loss is unacceptable? How does this balance against the 	<p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection. On-site specifics; sites are</p>



Delivery Policy ES3 - Maintaining quality of life within our environmental limits		
	housing requirements of the plan and need for affordable housing?	allocated having regard to Sustainability Appraisal across 17 SA objectives; this is a balanced judgement taking all objectives into consideration, SA Report Appendix 4 (CD3b) includes soil resources and mitigation and this should be addressed at the masterplan/ planning application stage. Defra’s Construction Code of Practice for the Sustainable Use of Soils on Construction Sites seeks to achieve positive outcomes such as cost savings, successful landscaping and enhanced amenity whilst maintaining a healthy natural environment.
	<ul style="list-style-type: none"> Contrary to the NPPF, which requires that the loss of best and most versatile land is only “considered”. 	Loss of best and most versatile land is one of a number of policy and material considerations to be assessed at the planning application stage. Paragraph 6.31 sets out this consideration need.
Policy wording modifications: None		
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> Policy is too broad in the matters which it covers and could be used to oppose housing allocations as it is subjective. 	This policy appears in the Adopted Local Plan (2015) ES3. The wording has been updated to reflect the latest guidance and best practice.
	<ul style="list-style-type: none"> In terms of loss of healthy soils, or best and most versatile agricultural land, what level of loss is unacceptable? How does this balance against the housing requirements of the plan and need for affordable housing? 	Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection. On-site specifics; sites are allocated having regard to Sustainability Appraisal across 17 SA objectives; this is a balanced judgement taking all objectives into consideration, SA Report Appendix 4 (CD3b) includes soil resources and mitigation and this should be addressed at the masterplan/ planning application stage. Loss of best and most versatile land is one of a number of policy and material considerations to be assessed and weighed at the planning application stage. Paragraph 6.31 sets out this consideration need. Defra’s Construction Code of Practice for the Sustainable Use of Soils on Construction Sites seeks to achieve positive outcomes such as cost savings, successful landscaping and enhanced amenity whilst maintaining a healthy natural environment.
	<ul style="list-style-type: none"> Contrary to the NPPF, which requires that the loss of best and most versatile land is only “considered”. 	Loss of best and most versatile land is one of a number of policy and material considerations to be assessed and weighed at the planning application stage. Paragraph 6.31 sets out this consideration need.
	Policy wording modifications: None	



Delivery Policy ES3 - Maintaining quality of life within our environmental limits		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> The scope of this policy focuses on quality of life and does not fully tackle the issue of sustainable development within environmental limits. 	The Local Plan provides environmental criteria against which individual development proposals can be assessed to seek to maintain the quality of life of residents, workers and visitors alike. This approach, when the Local Plan is read as a whole seeks with other policies to ensure the delivery of sustainable growth within our environmental limits.
	<ul style="list-style-type: none"> Amend language to prevent further degradation of ecological networks and natural capital (to align with the NPPF and 5 Year Environment Plan). 	The Local Plan provides environmental criteria against which individual development proposals can be assessed to seek to maintain the quality of life of residents, workers and visitors alike. This approach, when the Local Plan is read as a whole (including Delivery Policies ES6 and DES2 amongst others) seeks with other policies to ensure the delivery of sustainable growth within our environmental limits taking account of ecological networks and natural capital.
Policy wording modifications: None		
Pegasus Group for Robert Hitchins Ltd (879)	<ul style="list-style-type: none"> New criterion (8) is proposed but Paragraph 170 of the NPPF identifies policies contribute to and enhance the natural and local environment by, amongst other matters, protecting and enhancing soils (in a manner commensurate with their statutory status or identified quality in the development plan). The intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services should also be recognised, including the economic and other benefits of the best and most versatile (BMV) agricultural land. Natural England produced a Guide to assessing development proposals on agricultural land (February 2021) Developers and local planning authorities (LPAs) should refer to policies and legislation when considering development proposals that affect agricultural land and soils. In the policy wording as proposed it is not clear how this policy can be effectively implemented. Criterion 1 – 7 can all be mitigated, but it is not clear what an “... unacceptable 	<p>Comment noted.</p> <p>Loss of best and most versatile land is one of a number of policy and material considerations to be assessed and weighed at the planning application stage. Paragraph 6.31 sets out this consideration need and a reasoned professional judgement will need to be made at that time. The Council acknowledges Defra’s Construction Code of Practice for the Sustainable Use of Soils on Construction Sites which seeks to achieve positive outcomes such as cost savings, successful landscaping and enhanced amenity whilst maintaining a healthy natural environment.</p>



Delivery Policy ES3 - Maintaining quality of life within our environmental limits		
	level of loss of healthy soils” refers to.	
	Policy wording modifications:	
	<ul style="list-style-type: none"> “New development is required to make provision for the effective use and protection of natural resources where applicable, including: avoiding the development of the best and most versatile agricultural land, unless it is demonstrated to be the most sustainable choice from reasonable alternatives, by first using areas of poorer quality land in preference to that of a higher quality; “ Alternatively the wording be included in Policy CP14 High Quality Sustainable Development. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Other representations	Issues raised	Stroud District Council Response
Inconsistent application of policy		
474	<ul style="list-style-type: none"> Many contradictions with the PS37 site. 	The Council considers Strategic Site Allocation PS37 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
Policy wording modifications: None		



Delivery Policy ES4 - Water resources, quality and flood risk				
Number of representations: 7		Support: 3	Object: 3	Comment: 1
Stakeholders	Comments		Stroud District Council Response	
Support				
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> Welcome the commitment to promoting Natural Flood Management as a favoured approach and that such projects should seek to 'conserve and enhance the ecological value of the water environment'. The District should be congratulated on it. 		Comment noted.	
Policy wording modifications: None				
Object				
RPS Group for Stroud Corporation NV (917)	<ul style="list-style-type: none"> The requirement for upstream rural SuDS projects outside of an application site boundary needs to be tested to be directly related to the development and fairly and reasonably related in scale and kind to the development. Object to a contribution to an upstream rural SuDS project. 		The Stroud Rural SuDs project is an innovative Natural Flood Management project working to reduce flood risk by tackling upstream surface water and flooding issues throughout the reactive catchment of the River Frome and all its tributaries. It is a tool in the NPPF to mitigate or manage flood risk. Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms if they meet the tests that they are necessary to make the development acceptable in planning terms.	
Policy wording modifications:				
	<ul style="list-style-type: none"> Reference to a contribution to an upstream rural SuDS projects be omitted from Policy ES4 		All suggested policy wording modifications will be considered by the Inspectors at the EIP.	
SDC Cllr Haydn Jones (500)	<ul style="list-style-type: none"> Proven surface and ground water flooding is an issue for large scale development. Allowing development on a site subject to flooding is wholly unacceptable. Significant development has an inevitable consequence downstream. Any development, of whatever scale, should protect those downstream from negative effects of the development. Where development proposed is on a strategic scale it should not be permitted as mitigation is never practically, financially or realistically feasible. 		The Council will observe the requirements of the NPPF and accompanying guidance. All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.	
Policy wording modifications:				



Delivery Policy ES4 - Water resources, quality and flood risk		
	<ul style="list-style-type: none"> Modify to exclude strategic scale development from land known to suffer from ground and surface water flooding. Modify policy to protect downstream interests at site developer expense. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Comment		
Environment Agency (933)	<ul style="list-style-type: none"> Defra's recent (July 2021) designation of Severn Trent Water's geographical area as being in "Serious Water Stress" now provides support and evidence to require higher/tighter standards of water efficiency in Local Plan policy. Accordingly seek alterations to policy ES4 and/or supporting text. Without appropriate water efficiency standards, the Plan is not justified by a robust evidence base, and not effective in delivering sustainable development. 	The Council has prepared a Statement of Common Ground with the Environment Agency, which has acknowledged this matter and where relevant parties are committed to working together to resolve this matter and will continue dialogue accordingly. (Duty to Cooperate Statement (EB3). The Council recognises this change in circumstances with the designation of Severn Trent Water's geographical area as being in "Serious Water Stress" providing support and evidence to require higher/tighter standards of water efficiency. The Council is working with both Severn Trent and the Environment Agency.
	Policy wording modifications:	
	<ul style="list-style-type: none"> Without appropriate water efficiency standards, the Plan is not justified by a robust evidence base, and not effective in delivering sustainable development. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Other representations	Issues raised	Stroud District Council Response
Flood Risk		
214	<ul style="list-style-type: none"> Very concerned by the flood risk from Wisloe (PS37) and Sharpness (PS36). 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
474	<ul style="list-style-type: none"> Many contradictions with PS37 Wisloe site. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
Policy wording modifications: None		



Delivery Policy ES5 - Air quality				
Number of representations: 7		Support: 3	Object: 2	Comment: 2
Stakeholders	Comments		Stroud District Council Response	
Support				
Natural England (864)	<ul style="list-style-type: none"> Natural England welcomes this policy. Agree with the HRA report conclusions ruling out adverse effects on the integrity of the Cotswold Beechwoods SAC alone and in combination with other plans and projects. Air quality theme continues to evolve in the light of recent case law and the HRA report's recommendation that air quality monitoring should be established along the section of the A46 which passes through the SAC in order to inform any future HRA by the Council or neighbouring local planning authorities. 		Comment noted. Discussion is underway with Natural England and the relevant LPAs regarding future monitoring of air quality at the Cotswolds Beechwoods SAC.	
Policy wording modifications: None				
Object				
SDC Cllr Haydn Jones (500)	<ul style="list-style-type: none"> The 2019 SDC Sustainability Appraisal was clear that any development should be located away from sources of pollution including energy from waste plants, the strategic highway or rail network. Bunding is less effective against air pollution. Vague expressions in this policy about layout, separation distances, undefined abatement technology, managing the natural environment, development phasing and highway management are wholly inadequate. 		<p>Topic Paper – Transport October 2021 ((EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices and addressing air quality.</p> <p>The Sustainability Appraisal includes assessment of all sites and reasonable alternatives against SA 10: To ensure that air quality continues to improve and SA11: To maintain and enhance the quality of ground and surface waters and to achieve sustainable water resources management in the District, SA Report Appendix 3 - 9 (CD3b).</p> <p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p>	
Policy wording modifications:				
	<ul style="list-style-type: none"> Do not locate strategic development adjoining 		All suggested policy wording modifications will be considered by the	



Delivery Policy ES5 - Air quality		
	strategic road and/or rail network unless it is located within a lower, culverted location such as proposed PGP1 location at Grove Lane, Whitminster (Additional Housing Options consultation October 2020) where the topography provides a degree of protection from air pollutants or PGP2 where real separation and appropriate bunding could be effective.	Inspectors at the EIP.
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> Welcome the recognition that air quality poses a significant threat to some internationally designated sites. It is however, a major threat to nationally and locally designated sites, with the majority of grassland SSSI's in the UK experiencing nitrogen levels in excess of the tolerable limits. Suggest air quality screening be extended to avoid significant adverse impacts to nationally and locally designated sites to demonstrate adherence to the NERC Act duties to protect and enhance biodiversity. 	Comment noted and Natural England with the Council recognise the threat to nationally and locally designated sites. The Council considers that the Local Plan when read as a whole has appropriate policy safeguards to avoid significant adverse impacts to nationally and locally designated sites.
Policy wording modifications:		
	<ul style="list-style-type: none"> Suggest that air quality screening should be extended to avoid significant adverse impacts to nationally and locally designated sites as well. This would demonstrate adherence to the NERC Act duties to protect and enhance biodiversity. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> Allocation PS44 is in an area where there are no air quality concerns. Ensure that the policy is not used to place additional unnecessary competing requirements on the master planning of the site. 	Comment noted.
Policy wording modifications: None		



Delivery Policy ES5 - Air quality		
Other representations	Issues raised	Stroud District Council Response
Inconsistent application of policy		
474	<ul style="list-style-type: none"> Many contradictions with PS37 Wisloe site. 	The Council considers Strategic Site Allocation PS37 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
Policy wording modifications: None		



DES1

Delivery Policy DES1 - Conversion of redundant agricultural, forestry and rural buildings				
Number of representations: 3		Support: 2	Object: 0	Comment: 1
Stakeholders	Comments		Stroud District Council Response	
Support				
No comments received	Policy wording modifications: None			
Object				
No comments received	Policy wording modifications: None			
Comment				
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> The policy should state that there will be no significant adverse impact on biodiversity, specifically populations of protected species. This is necessary in order to be legally compliant with the WAC Act 1981 (as amended) and the Conservation of Species and Habitats Regulations 2017. 		The Local Plan should be read as a whole. Policy ES6 provides biodiversity safeguards compliant with the W&C Act 1981 (as amended) and the Conservation of Species and Habitats Regulations 2017. Furthermore supporting text paragraph 6.48 alerts the reader to these issues.	
	Policy wording modifications:			
	<ul style="list-style-type: none"> The policy should say there will be no significant adverse impact on biodiversity, specifically populations of protected species. 		All suggested policy wording modifications will be considered by the Inspectors at the EIP.	
Other representations	Issues raised		Stroud District Council Response	
No comments received				
Policy wording modifications: None				



Delivery Policy ES6 - Providing for biodiversity and geodiversity				
Number of representations: 21		Support: 7	Object: 3	Comment: 11
Stakeholders	Comments		Stroud District Council Response	
Support				
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> Support delivery of bio and geodiversity as part of new development. However, this should be aligned with the emerging statutory requirements. It should be a matter for development assessors to determine for each individual application. Any delivery above 10% should be the choice of the applicant as it may not be possible in all circumstances to achieve more than this (e.g. some brownfield sites). 		Comment noted. The Council will assess each application on its own merits taking into account local plan policies and any other material considerations as well as its statutory duties.	
	<ul style="list-style-type: none"> Support protection of designated wildlife sites, but the text in the eSDLP needs to refer to mitigation or compensation. If the policy is to remain it should set of this approach more explicitly. Alternatively, there is a wealth of legislation through the Habitat Regulations, EIA Regulation, NPPF2019 and caselaw that can be relied upon if this part of the policy were to be removed 		Comment noted, however the policy and supporting text does make reference to mitigation and compensation.	
Policy wording modifications: None				
Savills (UK) Limited for Berkeley Estate (878)	<ul style="list-style-type: none"> The principle of this policy is supported, which provides conservation to the Wildfowl and Wetlands Trust at Slimbridge, which is under TBE's ownership. 		Comment noted	
	Policy wording modifications: None			
Gloucestershire County Council (904)	<ul style="list-style-type: none"> The policy approach and associated SEA/HRA processes have produced an acceptable pre-submission version of the Local Plan. There are no obvious issues to raise regarding legal compliance, soundness or duty to co-operate including with our own authority. It is noted the Local Plan makes good provision for the forthcoming changes due if the Environment Bill receives Royal Assent. 		Comment noted	



Delivery Policy ES6 - Providing for biodiversity and geodiversity		
	<p>Policy wording modifications:</p> <ul style="list-style-type: none"> The various headers on each page of the HRA report do not correctly refer to the Pre-submission version of the Stroud Local Plan and need correcting. 	The HRA is an iterative document and will not be finalised until adoption of the Local Plan. The Council will correct the table headings to refer to the Pre-submission version of the Stroud Local Plan.
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> Strongly supports this policy because it demonstrates adherence to the policies of the NPPF, the 25 Year Environment Plan, current legislation and incoming legislation through the Environment Bill. The plan would benefit from enhanced cross-referencing. 	Comment noted. The Council considers that further cross referencing is not necessary to convey the policy intent or purpose and to keep the Local Plan succinct. Statutory requirements would be complied with and any other material considerations taken into account.
	<ul style="list-style-type: none"> The absence of an explicit commitment to deliver substantial new areas of SANGs as this is the only effective method of conserving and enhancing the SAC's and SPA from the significant increased recreational pressure caused by the additional housing targets of the plan. 	SANGs and SPA/SACs are considered as part of the HRA. Any proposed development site located within a SAC, SPA and/or Ramsar core catchment zone could provide or contribute to identified mitigation measures, in accordance with the agreed Avoidance and Mitigation Strategy, in order to avoid an adverse effect on the integrity of the SAC associated with increased recreational activity over the plan period.
	<p>Policy wording modifications:</p> <ul style="list-style-type: none"> A requirement for garden communities to deliver in excess of the legal minimum requirements for biodiversity net gain. This is a particular issue due to the sensitive location of some allocation that may impact the SAC and SPA and land functionally linked to it. A minimum requirement of 20% BNG is proposed for these strategic allocations. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
National Trust (304)	<ul style="list-style-type: none"> Support the Biodiversity Net Gain approach through its Local Plan which is essential to tackle the decline in nature in the UK over several decades. 	Comment noted
	<ul style="list-style-type: none"> Need to ensure that higher than 10% Biodiversity Net Gain takes place where local situations allow. The emerging data from existing schemes is 10% can be delivered on-site by most developers, so a higher threshold is needed to create genuinely new 'off site' habitats which contribute to Nature Recovery Networks, etc. 	<p>The Council will carefully consider net gain aspects taking account of site location, site biodiversity interest and the opportunity to restore habitats and enhance wildlife corridors and stepping stones in the wider wildlife networks.</p> <p>The Council considers Local Plan allocations to be in accordance with the development strategy. Topic Paper: The Development Strategy October 2021 (EB4) sets out the Council's approach to identifying and assessing potential</p>



Delivery Policy ES6 - Providing for biodiversity and geodiversity		
	<ul style="list-style-type: none"> Ensure that the Plan’s allocations do not conflict with Natural Capital/Nature Recovery Network mapping and implementation 	spatial strategy options and how the development strategy was selected to meet requirements. The Council will further consider the Natural Capital and Nature Recovery Network aspects at the planning application stage.
Policy wording modifications: None		
Natural England (864)	<ul style="list-style-type: none"> Welcome this policy. Suggest look at these points as well: Habitats sites <ul style="list-style-type: none"> (i) The reference to ‘alternative to the development’ here is misleading. This relates to Stage 3 of the HRA process i.e. ‘Alternative Solutions – deciding whether there are alternative solutions which would avoid or have a lesser effect on the European Site’. The distinction between this and an ‘alternative to the development’ should be recognised. (ii) ‘coherence’ of the site(s) – this relates to stage 4 of the HRA process i.e. ‘Imperative reasons of overriding public interest (IROPI) and compensatory measures’. The text should refer to the ‘overall coherence of the National Sites Network’. 	Comments noted. This refers to criteria a and c of the policy ES6 in respect of international sites. The Council has prepared a Statement of Common Ground (EB3) with Natural England and both parties are committed to resolve this HRA reference matter and will continue dialogue accordingly.
	<ul style="list-style-type: none"> The Council is the competent authority under the Habitats Regulations and is itself required to carry out HRA. Applicants are obliged to provide suitable information to inform the Council’s HRA and in some cases, such as for large developments, applicants may choose to submit a ‘Shadow’ HRA of their own to inform the Council’s assessment of the proposal. As a result, where a contribution to the Avoidance and Mitigation Strategy is secured HRA will still be needed but the development management process should be significantly streamlined. Natural England expects 	Comments noted. The Council does carry out appropriate assessment of planning applications.



Delivery Policy ES6 - Providing for biodiversity and geodiversity		
	<p>that this will allow the Council as LPA to draw up a standardised approach to HRA of applications conforming to this 'developer contribution only' scenario. In these circumstances the applicant will not be required to submit further information to the LPA.</p>	
	<ul style="list-style-type: none"> Para 6.54 – 'Habitats sites' & Para 8.11 (Conclusions) of the Sustainability Appraisal overlook the HRA report's conclusion that an update/review of the respective, existing mitigation strategies for the Rodborough Common SAC and Severn Estuary SAC/SPA and Ramsar Site is needed in order to ascertain the absence of adverse effects on the integrity of these European or Habitats Sites. Regard the plan to be legally compliant regarding HRA. 	<p>Comments noted on legal compliance. The Council is currently producing a new mitigation strategy for the Cotwolds Beechwoods SAC and updating/revising the Rodborough and Severn Estuary Mitigation Strategies working with our consultants to reflect the conclusions of the latest HRA information.</p>
Policy wording modifications:		
	<ul style="list-style-type: none"> ES6 – Revised text proposed: <ol style="list-style-type: none"> There are no alternative solutions. Appropriate compensatory provision can be secured to ensure that the overall coherence of the National Site Network is protected and enhanced. Cotswold Beechwoods SAC mitigation - Revised text proposed at paragraph 6.55: <p>'the District Council will not require further information to inform Habitats Regulations Assessment (HRA) of the planning application'.</p> 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
Object		
No comments received	Policy wording modifications: None	
Comment		
Joint Core Strategy (916)	<ul style="list-style-type: none"> The Gloucestershire district authorities continue to work in a positive and proactive way to address the impact of growth on Special Areas of Conservation, 	<p>Comment noted</p>



Delivery Policy ES6 - Providing for biodiversity and geodiversity		
	<p>Special Protection Areas and Ramsar sites. Includes collaboration in the preparation of the Cotswolds Beechwoods Recreational Study and Mitigation Strategy. The JCS authorities will continue to work together as the JCS Review progresses.</p>	
<p>Policy wording modifications: None</p>		
<p>Home Builders Federation (HBF) (892)</p>	<ul style="list-style-type: none"> Under Delivery Policy ES6, development proposals shall provide a minimum of 10% net gain in biodiversity by incorporating and enhancing existing and creating new biodiversity features within their design and maximising opportunities to enhance and create links between ecological networks and habitats of principal importance both on-site and, where possible, with nearby features. The Council’s policy approach to biodiversity net gain should not deviate from the Government’s proposals as set out in the Environment Bill. 10% gain provides certainty in achieving environmental outcomes, deliverability of development and costs for developers using the DEFRA Biodiversity Metric. The Council should not specify a requirement above 10%, the prefix “minimum” should be deleted. The provision for a transition period of two years. Means transitional arrangements should be incorporated into Delivery Policy ES6. There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council’s viability assessment. The Council’s final viability assessment appraisals include a cost of £22,000 per hectare (para 8.97), which is at the bottom end of the range set out in the DEFRA Assessment. This may under-estimate cost impacts. There may also be an impact on the ratio of gross to 	<p>Comment noted. The first sentence wording in Delivery Policy ES6 is that “Development proposals shall deliver a minimum of 10% biodiversity net gain through enhancement and creation of ecological networks within and connecting with those beyond the District by..” This accords with the Environment Bill which received Royal Assent on 9 November 2021. The Act sets out the following key component to mandatory BNG:</p> <ul style="list-style-type: none"> Minimum 10% gain required calculated using Biodiversity Metric & approval of net gain plan. <p>Transitional arrangement options are being currently consulted upon in the <u>consultation on Biodiversity Net Gain Regulations and Implementation</u>. The Council will incorporate any future transitional arrangement under review when final guidance is published.</p> <p>The Council’s Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p>



Delivery Policy ES6 - Providing for biodiversity and geodiversity		
	net site acreage. It is unclear if this has been considered by the Council in Table 9.2 – Net / Gross Assumptions.	
	Policy wording modifications:	
	<ul style="list-style-type: none"> Delivery Policy ES6 should be modified to remove inconsistencies with the Government’s proposals set out in the Environment Bill 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
RPS Group for Stroud Corporation NV (917)	<ul style="list-style-type: none"> This policy states that development should provide a minimum of 10% net gain in biodiversity and resists impact on the strategic ecological network causing fragmentation or otherwise prejudice its effectiveness. There are development sites where the realisation of other planning objectives take priority, so this policy should allow greater flexibility on the development of strategic ecological networks, where appropriate. 	The Councils approach accords with the Environment Bill which received Royal Assent on 9 November 2021 and the NPPF. The Council recognises the Climate and Ecological emergencies which necessitate BNG.
	Policy wording modifications:	
	<ul style="list-style-type: none"> Policy should allow greater flexibility on the development of strategic ecological networks, where appropriate. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
BBA Architects for Vistry Group (912)	<ul style="list-style-type: none"> Generally supportive of the policy but must be consistent with National policy and legislation. The Environment Bill will require a 10% net gain. This will be a national requirement, providing certainty for developers with regards to the costs associated with development. The 10% figure was concluded to be the correct amount. Anything beyond this is not justified. Fully support the recognition that BNG can be achieved through off site mechanisms and there may be occasions where off site may achieve a better outcome than onsite mechanisms, for both biodiversity and for development, and this should be included within the wording of policy. 	<p>Please refer to NPPF Paragraph 174 (d) on ecological networks. Mandatory biodiversity net gain as set out in the Environment Act applies in England only by amending the Town & Country Planning Act (TCPA). It is likely to become law in 2023. The Act sets out the following key components to mandatory BNG:</p> <ul style="list-style-type: none"> Minimum 10% gain required calculated using Biodiversity Metric & approval of net gain plan Habitat secured for at least 30 years via obligations/ conservation covenant Habitat can be delivered on-site, off-site or via statutory biodiversity credits There will be a national register for net gain delivery sites



Delivery Policy ES6 - Providing for biodiversity and geodiversity		
	<ul style="list-style-type: none"> Similarly, point (4) also refers to development proposals “in close proximity to an ecological network corridor should enhance functionality and connectivity of the corridor”. Again it is questionable how a developer could improve the “functionality” of a network if it is not within their contractual landownership. In any case, it is questioned whether the Ecological Network corridors are appropriate to have this level of restrictions to development within them. The policy is not appropriately supported by an evidence base and therefore its inclusion is not justified. 	<ul style="list-style-type: none"> The mitigation hierarchy still applies of avoidance, mitigation and compensation for biodiversity loss.
	<ul style="list-style-type: none"> Criterion (2) refers to the creation of links between ecological networks and habitat of principal importance on site, and “where possible, with nearby features”. The policy wording is poorly drafted and it is unclear what is intended with the reference “where possible”. Developers cannot control biodiversity beyond their contractual landownership position. 	The wording recognises that there may or may not be opportunities to work with landowners to create links between ecological networks and habitat of principal importance. There are a range of tools and agreements available to developers both now and being developed E.g. Entering s106 agreements or buying biodiversity credits with landowners could help achieve this.
	<ul style="list-style-type: none"> Criterion (4) refers to development proposals should enhance functionality and connectivity of the corridor. It is questionable how a developer could improve the “functionality” of a network if it is not within their contractual landownership. 	There are a range of tools and agreements available to developers both now and being developed E.g. Entering s106 agreements or buying biodiversity credits with landowners could help achieve this. The Council believe off site works could improve functionality such as additional hedgerow and tree planting. Features could provide stepping stones to improve functionality. Barriers to movement such as structures or lighting could be removed.
Policy wording modifications:		
	<ul style="list-style-type: none"> Amend first paragraph to read: Development proposals shall provide a minimum of 10 % net gain in biodiversity in accordance with national requirements, through... Amend point 2 to read: Maximising opportunities to enhance and create links between ecological networks and habitats of 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.



Delivery Policy ES6 - Providing for biodiversity and geodiversity		
	<p>principal importance, where relevant.</p> <ul style="list-style-type: none"> Delete point 4 Delete paragraph after criterion iv. Replace with “Mechanisms for delivering Biodiversity Net Gain (BNG) can be on site, offsite, in full or combination, with the aim of providing an overall improvement in local biodiversity and/or geodiversity” 	
Savills (UK) Limited for Coln Residential (934)	<ul style="list-style-type: none"> Policy ES6 should be applied pragmatically in the event of much needed improvements to natural resources and biodiversity, and should not act as a hindrance to applicants. 	Comment noted
Policy wording modifications: None		
Rapleys LLP for Crest Nicholson Land and Partnerships (897)	<ul style="list-style-type: none"> The Council’s policy approach to biodiversity should not deviate from the Government’s proposals on biodiversity gain. Necessarily it does not prevent developers who are able to exceed this requirement from doing so if feasible. The addition of ‘minimum’ to the 10% requirement implies that delivering 10% BNG is barely acceptable, when it reflects the national standard. The qualification is not justified. 	The Council considers that the policy has flexibility to exceed the minimum and accords with the Environment Bill which received Royal Assent on 9 November 2021.
	<ul style="list-style-type: none"> The policy is worded in a way that implies that development should be resisted as a default position: Use of the phrasing Where development is considered necessary, adequate mitigation measures, or exceptionally compensation measures, will be required...is unjustifiably negative. 	The Council believes the wording does not imply development should be resisted and is appropriate by reflecting the NPPF requirements.
Policy wording modifications: None		
	<ul style="list-style-type: none"> The Policy should adopt the following approach: “Where development has an impact on biodiversity/natural capital, adequate mitigation, or compensatory measures where necessary, to achieve 10% net gain, will be required.” The wording of the Policy also fails to draw any 	<p>The requirement accords with the Environment Bill which received Royal Assent on 9 November 2021.</p> <p>The Council believes the Policy does reflect the hierarchy of protected biodiversity sites at Paragraph 175 of the NPPF.</p>



Delivery Policy ES6 - Providing for biodiversity and geodiversity		
	<p>effective distinction between national and international sites and sites of local interest, by stating that proposals that have an adverse effect on either will not be permitted/should not take place. To be effective the policy should be clearer on the different approaches that will be taken, in accordance with the approach at paragraph 171 of the NPPF.</p>	
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> The Environment Bill has yet to receive Royal Assent and it is not clear from the evidence base as to whether Biodiversity Net Gain has been properly considered in the allocations. The Policy is unclear as to what will be the assessment method for calculating net gain. 	The requirement accords with the Environment Bill which received Royal Assent on 9 November 2021. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection. On-site specifics; including safeguarding and enhancing local biodiversity, to be addressed at the masterplan/ planning application stage.
	<ul style="list-style-type: none"> Paragraph 6.53 sets out that net gain should be achieved on sites where possible. In instances where this is not achievable, off-site measures are identified, but there are no mechanisms in place. Further policy guidance is essential to understand how this can be achieved. 	There are a range of tools and agreements available to developers both now and being developed E.g. Entering s106 agreements or buying biodiversity credits with landowners could help achieve this. The Council will continue to keep BNG guidance under review.
Policy wording modifications: None		
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> The Environment Bill has yet to receive Royal Assent and it is not clear from the evidence base as to whether Biodiversity Net Gain has been properly considered in the allocations. The Policy is unclear as to what will be the assessment method for calculating net gain. 	The first sentence wording in Delivery Policy ES6 is that “Development proposals shall deliver a minimum of 10% biodiversity net gain through enhancement and creation of ecological networks within and connecting with those beyond the District by..” This accords with the Environment Bill which received Royal Assent on 9 November 2021. The Act sets out the following key component to mandatory BNG: <ul style="list-style-type: none"> Minimum 10% gain required calculated using Biodiversity Metric & approval of net gain plan.
	<ul style="list-style-type: none"> Paragraph 6.53 sets out that net gain should be achieved on sites where possible. In instances where this is not achievable, off-site measures are identified, but there are no mechanisms in place. 	There are a range of tools and agreements available to developers both now and being developed E.g. Entering s106 agreements or buying biodiversity credits with landowners could help achieve this. The Council will continue to keep BNG guidance under review.



Delivery Policy ES6 - Providing for biodiversity and geodiversity		
	Further policy guidance is essential to understand how this can be achieved.	
Policy wording modifications: None		
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> The Environment Bill has yet to receive Royal Assent and it is not clear from the evidence base as to whether Biodiversity Net Gain has been properly considered in the allocations. The Policy is unclear as to what will be the assessment method for calculating net gain. 	<p>The Environment Bill received Royal Assent on 9 November 2021. The Act sets out the following key component to mandatory BNG:</p> <ul style="list-style-type: none"> Minimum 10% gain required calculated using Biodiversity Metric & approval of net gain plan. <p>The Defra Metric is currently proposed as the industry standard and is recommended. This does not need to be in the policy wording as national guidance and other advice refers to its use.</p>
	<ul style="list-style-type: none"> Paragraph 6.53 sets out that net gain should be achieved on sites where possible. In instances where this is not achievable, off-site measures are identified, but there are no mechanisms in place. Further policy guidance is essential to understand how this can be achieved. Otherwise, it could lead to contributions being sought that could make allocations unviable. 	<p>The Council considers there are a range of tools and agreements available to developers both now and being developed E.g. Entering s106 agreements or buying biodiversity credits with landowners could help achieve this. The Council will continue to keep BNG guidance under review. The Council's Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p>
Policy wording modifications: None		
Savills for L & Q Estates (913)	<ul style="list-style-type: none"> Support the emerging national legislation seeking a 10% net gain in biodiversity. Assume utilising the DEFRA metric in the intervening period prior to the implementation of the legislation but needs to be confirmed in the policy given there are a number of other historic metrics, and the delay in the Environmental Bill may mean the Local Plan is implemented prior to the national legislation. 	<p>In recognition of the ecological emergency it is appropriate to use the SDC current policy. The Defra Metric is currently proposed as the industry standard and is recommended. This does not need to be in the policy wording as national guidance and other advice refers to its use. This metric is already in its third version and will no doubt be further updated over the lifetime of the Local Plan. Other metrics existing (such as the Warwickshire metric) or proposed in the future can be considered on their own merits to calculate the biodiversity net gain.</p>
	<ul style="list-style-type: none"> To ensure compliance with national legislation, policy and guidance the reference to 'causes harm' under the Internationally important sites discussion should be amended to having an adverse impact on the integrity of the designation; with this reflecting the 	<p>The NPPF (2021) Paragraph 180 (a) uses harm and the term was considered appropriate in the 2015 Adopted Local Plan. Natural England support this policy.</p>



Delivery Policy ES6 - Providing for biodiversity and geodiversity		
	<p>test set out in the Habitat Regulations.</p> <ul style="list-style-type: none"> To ensure compliance with national legislation, policy and guidance ‘adversely affect’. and the reference to national designations, does not reflect paragraph 175 of the NPPF, which confirms that any residual adverse impact would be weighed against the benefits of the development. 	<p>The Council considers the use of adversely affect is appropriate as reflected in Paragraph 174 (e) of the NPPF.</p>
	<ul style="list-style-type: none"> The policy includes a test of no adverse effect on local sites – both designated and the more generalised network. This is not a proportionate response to the importance of these assets. It is not considered reasonable that a higher bar is set for local sites. There must be a clear distinction between designated local sites, and ‘local ecological or green infrastructure networks’ the latter could be applied to virtually all land within the district boundary. Indeed the Gloucestershire Nature Map referenced in the explanatory text indicates green infrastructure opportunities, recovery areas etc over vast parts of the district. It should be described as providing a starting point for the consideration of habitat protection, restoration and enhancement, as opposed to being identified as a baseline of valuable habitat – the wording of paragraph 6.50 should be amended to reflect this. 	<p>Comments noted. Any green infrastructure opportunities, recovery areas etc would have to satisfy strict tests including being reasonably related to the proposed development and proportionate. The relevant documents assist the reader in looking at those considerations related to a site.</p>
	<ul style="list-style-type: none"> Recreational impacts on designations at paragraph 6.54 has the inference that all development will have to pay a contribution is not supported. The mitigation strategy has yet to be published and there are clearly opportunities at strategic sites for mitigation to be provided onsite. Further, the text assumes that development needs to proceed to Appropriate Assessment – this is not accurate, as it may be 	<p>The Mitigation Strategy does not impose a cost. It is an option. A developer may contribute to the Mitigation Strategy or choose to provide mitigation on their site to meet the HRA requirements. On smaller sites where this cannot be achieved, the mitigation strategy may facilitate compliance with the HRA and appropriate assessment.</p>



Delivery Policy ES6 - Providing for biodiversity and geodiversity		
	<p>possible to screen out the need for this through the development management process. The wording of this paragraph should be reviewed.</p> <ul style="list-style-type: none"> The Cotswolds Wood SAC Mitigation Strategy must be published as part of the evidence base supporting the Local Plan, to ensure that all parties are able to review and comment upon a document which the Authority are seeking to rely upon within the HRA accompanying the local plan. 	
		The Cotswolds Wood SAC Mitigation Strategy is part of the Evidence base. It provides a developer with an opportunity to comply with the HRA findings and appropriate assessment requirements. The developer has an option to use the Cotswolds Beechwoods SAC Mitigation Strategy or not.
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Biodiversity Loss		
240	<ul style="list-style-type: none"> Do not build on biodiverse rich land 	The Council consider there are adequate policy safeguards to protect biodiverse land in the Local Plan when read as a whole.
86	<ul style="list-style-type: none"> Support but think requirements for developers in greenfield sites should be enhanced to protect biodiversity and not allow further reduction in flora and fauna. 	The Council consider there are adequate policy safeguards to protect biodiverse and greenfield land in the Local Plan when read as a whole.
Inconsistent application of policy		
474	<ul style="list-style-type: none"> Many contradictions with PS37 Wisloe site. 	The Council considers Strategic Site Allocation PS37 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
Not in conformity with Government Policy		
681	<ul style="list-style-type: none"> Delivery Policy ES6 should be modified to remove inconsistencies with the Government's proposals set out in the Environment Bill. Policy ES6 fails to ensure development will comply with NPPF (Para 180) by requiring no net loss of biodiversity within a development site leaving development sites at risk of resulting in a net loss in biodiversity. Delivery Policy ES6 should be modified to remove inconsistencies 	The Council considers there are no inconsistencies with paragraph 179 b which states in terms of habitats and biodiversity: To protect and enhance biodiversity and geodiversity, plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.



Delivery Policy ES6 - Providing for biodiversity and geodiversity		
	with the Government’s proposals set out in the Environment Bill <ul style="list-style-type: none"> The policy does require 10% net gain but this can be achieved within the district, so not necessarily anywhere near the actual development. The district doesn’t have a scheme in place detailing how off-site net gain will be delivered meaning there is high risk of the required gains in biodiversity not being delivered. 	The County Council is working with LPAs & LNP on BNG. The Council would usually seek appropriate mitigation reasonably related to those protected species and/or habitats affected. The Council will put a plan in place detailing how BNG will be delivered taking account of any findings from the current <u>consultation on Biodiversity Net Gain Regulations and Implementation</u> .
Policy wording modifications:		
86	<ul style="list-style-type: none"> Increase requirement on developers on greenfield sites to provide wildlife with safe access routes through their development area, e.g. road tunnels for hedgehogs, etc. 	This can be provided through BNG and negotiation at the planning application stage. The policy does not exclude this requirement and refers to connectivity and wildlife corridor creation.



Delivery Policy ES7 - Landscape character				
Number of representations: 12		Support: 4	Object: 4	Comment: 4
Stakeholders	Comments		Stroud District Council Response	
Support				
North Nibley Parish Council (956)	<ul style="list-style-type: none"> Support the policies designed to protect, conserve and enhance the countryside and its biodiversity especially within the Cotswolds AONB including ES7. 		Comment noted	
Policy wording modifications: None				
Object				
Minchinhampton Parish Council (504)	<ul style="list-style-type: none"> Minchinhampton is wholly within the Cotswolds AONB, a statutory protected landscape in which development pressure is strictly controlled. This applies to any development land within the Parish. In addition, Minchinhampton enjoys the opportunity of the Common, and especially 6 additional outlying protected Commons. The Parish Council and its adopted Neighbourhood Plan would wish to see equivalent protection applied to Minchinhampton Common itself. The Common is under enormous pressure from leisure and social activity. It is grazed by free roaming cattle during the summer months, some of which are regrettably killed in traffic collisions on a regular basis. Recognise the national importance of preserving this area for posterity. The National Trust, owners of the 600 plus acres, fight an uphill battle to resist damage. Current expectations in terms of wildlife conservation and habitat loss means that Local Plan pressures have to be considered in relation to this important landscape. 		The NPPF, wildlife legislation and a range of organisations involved on the Common provide management opportunities and tools to conserve the interests of Minchinhampton. The Local Plan when read as a whole further promotes the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and allow the Council to pursue opportunities for securing measurable net gains for biodiversity.	
Policy wording modifications: None				
Wotton under Edge Town Council (952)	<ul style="list-style-type: none"> To protect the landscape character around Wotton, where no major development is planned, this policy should also apply to any “significant” development 		The Local Plan when read as a whole has a range of policy safeguards to protect the rural landscape and townscape character. Any application will be considered on its own merits and take into account any material	



Delivery Policy ES7 - Landscape character		
	(of say 5 or more dwellings) not just to “major” developments. This policy needs to take precedence over CP3, HC3, HC4 and DHC3.	considerations. Policies will be accorded weight according to the varying circumstances of each case. No one policy can take precedence over another in the absence of any details or appropriate justification.
Policy wording modifications: None		
Comment		
Gloucestershire Wildlife Trust (927)	<ul style="list-style-type: none"> Setting a goal to retain the existing distinctive qualities of the landscape may be unachievable and overly restrictive. The dual impacts of climate change and changes to agricultural payments are beyond the control of the Local Plan and will inevitably lead result in significant landscape character change. 	Comment noted. The Council will seek to retain the existing distinctive qualities of the landscape through the application of Local Plan policies and other planning controls where relevant.
Policy wording modifications: None		
Copperfield for Colethrop Farm Ltd (928)	<ul style="list-style-type: none"> Policy ES7 appears to differ from national policy regarding the AONB and is therefore not consistent with the NPPF2019. Paragraph 172 of the NPPF 2019 sets two tests for major development in AONBs: <ul style="list-style-type: none"> Exceptional circumstances. In the public interest. Neither of these tests feature in the emerging policy. Likewise, it does not invite the level of assessment that the NPPF 2019 seeks from applicants at a) to c) of paragraph 172. The national policy tests for development in AONBs are clear and concise and there is no need for the eSDLP to repeat or seek to re-define them. ES7 expects development to protect or enhance landscape character. The language used places an unrealistic barrier for larger scaled planned development which by its very necessity will impact in some manner on landscape character. Must be balanced against the need to house the population or create space for economic growth and stability in the most sustainable manner. 	<p>Comments noted. The Council considers this policy to be compliant with the NPPF 2021 paragraphs 176 and 177 .</p> <p>The Council has undertaken landscape character assessment and landscape sensitivity analysis (EB35 & EB36a & b). These are nationally recognised tools to help us understand and describe landscapes in an objective way to define distinctive characteristics, inform policy development, planning and land management decisions and assist in monitoring capacity of places to change. Strategic landscaping is a necessary and justified requirement to integrate the development into the landscape, identified in the allocation policies wording as a particular issue to address where necessary.</p>



Delivery Policy ES7 - Landscape character		
	<p>Policy wording modifications:</p> <ul style="list-style-type: none"> An effective policy would, under criterion 1, support development that is aligned with the prevailing landscape character and seeks to minimise any impacts. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
BBA Architects for Vistry Group (929)	<ul style="list-style-type: none"> The Policy should not provide the same level of protection to land outside of the AONB (which could be considered to affect the setting of the AONB), as land within the AONB. This is not justified, nor consistent with National Policy which makes a clear distinction between development within an AONB and development which affects its setting (Paragraph 176, NPPF, July 2021) If policy is needed in relation to the setting of AONBs, this would need to be fully justified by identifying the extent of the area of setting. 	The scale and extent of development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. Setting will be a professional judgement based on a variety of factors such as nature, scale and use proposed as to whether it would adversely impact the setting of the AONB.
	<p>Policy wording modifications:</p> <ul style="list-style-type: none"> The following words should be deleted from policy ES7 'Or on land that may affect its setting' 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Savills (UK) Limited for Coln Residential (930)	<ul style="list-style-type: none"> Support the principle of this policy. However, there is a clear conflict with guidance at paragraph 177 of the NPPF in regard to the assessment of planning applications where the development falls in to Areas of Outstanding Natural Beauty. For clarity, the reference to “national interest” in the final sentence of the first paragraph of this policy should be amended to read: “Major development will not be permitted unless it is demonstrated to be in the public interest and there is a lack of alternative sustainable development sites”. As drafted, the policy test is substantial and far exceeds national policy. 	That is what the last sentence reads as. The policy tests in Paragraph 177 of the NPPF 2021 are substantial and need not be repeated in Local Plan policy verbatim.
	<p>Policy wording modifications:</p>	



Delivery Policy ES7 - Landscape character		
Other representations	Issues raised	Stroud District Council Response
	<ul style="list-style-type: none"> For clarity, the reference to “national interest” in the final sentence of the first paragraph of this policy should be amended to read: “Major development will not be permitted unless it is demonstrated to be in the public interest and there is a lack of alternative sustainable development sites”. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Landscaping and Wildlife Corridors		
955	<ul style="list-style-type: none"> Landscaping in greenfield sites should explicitly show how they provide access corridors for animals to safely cross their development sites. 	Comment not relevant to this Policy. The Local Plan when read as a whole provides for wildlife movement corridors, ecological networks and GI infrastructure.
Loss of Landscape and Character		
948	<ul style="list-style-type: none"> Do not destroy the character of the area. 	Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES7) set out requirements for good design to ensure development is contextual and appropriate in townscape, local environment, character and amenity terms.
Inconsistent application of policy		
949	<ul style="list-style-type: none"> Many contradictions with PS37 Wisloe site. 	The Council considers Strategic Site Allocation PS37 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection. On-site specifics; including safeguarding and enhancing local landscape character, to be addressed at the masterplan/ planning application stage.
Policy wording modifications: None		



Delivery Policy ES8 - Trees, hedgerows and woodlands				
Number of representations: 18		Support: 8	Object: 2	Comment: 8
Stakeholders	Comments		Stroud District Council Response	
Support				
North Nibley Parish Council (875)	<ul style="list-style-type: none"> Supports the policies designed to protect, conserve and enhance the countryside and its biodiversity especially within the Cotswolds AONB including ES8. 		Comment noted	
Policy wording modifications: None				
Savills (UK) Limited for The Berkeley Estate (878)	<ul style="list-style-type: none"> Supports the Council's aspirations for enhancing the district's tree, hedgerow and woodland resource, but considers that the policy requirement for "no net loss of hedgerow" is not flexible. Developers will soon be legally required to deliver a measurable biodiversity net gain and this obligation will be sufficient to boost the hedgerow and ecological resource. There may be circumstances where the specific hedgerow is dying or is in declining condition which warrants removal. This paragraph should therefore be removed from the draft policy. 		The Council considers the policy to be flexible enough and can also be applied along with the BNG considerations and Delivery Policy ES6. The DEFRA metric will take into account these considerations. Hedgerows are an important landscape character and amenity component as the LCA analysis demonstrates as well as a biodiversity habitat resource and ecological network feature for many different species.	
Policy wording modifications:				
	<ul style="list-style-type: none"> The policy requirement for "no net loss of hedgerow" is not flexible - This paragraph should therefore be removed from the draft policy. 		All suggested policy wording modifications will be considered by the Inspectors at the EIP.	
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> Strongly support policy. Reference to the LNP Tree Strategy demonstrates Duty to Cooperate and the policy requirements align with the aspirations of the NPPF, 25 Year Environment Plan and upcoming legislation in the Environment Bill. 		Comments noted	
Policy wording modifications: None				
Minchinhampton Parish Council (504)	<ul style="list-style-type: none"> Support and Minchinhampton Parish Council is actively seeking areas for additional tree planting. 		Comments noted	
Policy wording modifications: None				
Natural England	<ul style="list-style-type: none"> Welcome this policy for the important role it has in 		Comments noted	



Delivery Policy ES8 - Trees, hedgerows and woodlands		
(864)	<p>supporting the protection, management and delivery of these resources. Trees, hedgerows and woodland play a vital part as a component of multifunctional green infrastructure, linking and buffering habitats and species from the landscape scale right up to people's doorsteps and, as a result, providing people with opportunities for contact with nature, with positive benefits for both physical and mental well-being. The resource also has a critical role to play in safeguarding ecosystem services and addressing climate change impacts. Welcome reference to the Gloucestershire Local Nature Partnership Tree Strategy.</p>	
Policy wording modifications: None		
Object		
No comments received		
Policy wording modifications: None		
Comment		
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> The concern with this policy is how the "unacceptable loss" of a tree/hedgerow is considered in the overall planning balance. The test appears to apply to all trees (irrespective of whether they are protected by a Tree Preservation Order or not). There may be instances on development sites that such loss is unavoidable. 	Each application is considered on its own merits and in the light of any other material considerations such as the DEFRA BNG metric for example.
Policy wording modifications: None		
Savills (UK) Limited for Coln Residential (934)	<ul style="list-style-type: none"> Support the Council's aspirations for enhancing the district's tree, hedgerow and woodland resource, but considers that the policy requirement for "no net loss of hedgerow" is not flexible. Developers will soon be legally required to deliver a measurable biodiversity net gain and this obligation will be sufficient to boost Stroud District's hedgerow and ecological resource. 	Comment noted. Each application is considered on its own merits and in the light of any other material considerations such as the DEFRA BNG metric for example.



Delivery Policy ES8 - Trees, hedgerows and woodlands		
	There may be circumstances where the specific hedgerow is dying or is in declining condition which warrants removal. This paragraph should therefore be removed from the draft policy.	
Policy wording modifications: None		
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> The concern with this policy is how the “unacceptable loss” of a tree/hedgerow is considered in the overall planning balance. The test appears to apply to all trees (irrespective of whether they are protected by a Tree Preservation Order or not). There may be instances on development sites that such loss is unavoidable. 	Each application is considered on its own merits and in the light of any other material considerations such as the DEFRA BNG metric for example.
Policy wording modifications: None		
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> The concern with this policy is how the “unacceptable loss” of a tree/hedgerow is considered in the overall planning balance. The test appears to apply to all trees (irrespective of whether they are protected by a Tree Preservation Order or not). There may be instances on development sites that such loss is unavoidable. 	Each application is considered on its own merits and in the light of any other material considerations such as the DEFRA BNG metric for example.
Policy wording modifications: None		
Savills for L & Q Estates (913)	<ul style="list-style-type: none"> Support the aspiration of this policy, and recognise the importance attached to trees and hedgerows. The policy as drafted seeks to extend the policy protection provided by the NPPF under paragraph 175 to ancient and veteran trees to a wider number of features including ‘locally valued’. This is not appropriate, with protection required to be proportionate. There is no description as to what constitutes locally valued trees so it is not possible for either a developer, the local community or indeed the Authority to effectively implement this element of the policy. 	Comment noted. Locally valued would be a consideration at the planning application or masterplanning stage. Locally valued trees can contribute to a sense of place and establishment as well as local landscape character. They may have cultural or historical associations with an area. They may offer an important biodiversity resource. All these elements will be assessed at the time of an application or masterplanning stage.



Delivery Policy ES8 - Trees, hedgerows and woodlands		
	Policy wording modifications: None	
RCA Regeneration Ltd for Piper Homes(877)	<ul style="list-style-type: none"> Whilst supportive of the approach to protecting trees and hedgerows, the policy prevents development which results in the loss of “locally valued trees”. This should be instead restricted to protected trees only, as there is no justification (or definition in the explanatory text) as to what might constitute a locally valued tree. This provides the potential to become a veto to development, without justification. 	Comment noted. Locally valued would be a consideration at the planning application or masterplanning stage. Locally valued trees can contribute to a sense of place and establishment as well as local landscape character. They may have cultural or historical associations with an area. They may offer an important biodiversity resource. All these elements will be assessed at the time of an application or masterplanning stage.
	Policy wording modifications: None	
RCA Regeneration Ltd for Land Development and Estates Ltd (861)	<ul style="list-style-type: none"> Whilst supportive of the approach to protecting trees and hedgerows, the policy prevents development which results in the loss of “locally valued trees”. This should be instead restricted to protected trees only, as there is no justification (or definition in the explanatory text) as to what might constitute a locally valued tree. This provides the potential to become a veto to development, without justification. 	Comment noted. Locally valued would be a consideration at the planning application or masterplanning stage. Locally valued trees can contribute to a sense of place and establishment as well as local landscape character. They may have cultural or historical associations with an area. They may offer an important biodiversity resource. All these elements will be assessed at the time of an application or masterplanning stage.
	Policy wording modifications: None	
Other representations	Issues raised	Stroud District Council Response
Tree, hedgerow and woodland loss		
240	<ul style="list-style-type: none"> Do not destroy our trees , hedgerows and woodlands 	Comment noted
681	<ul style="list-style-type: none"> NPPF in paragraph 180 states “When determining planning applications, local planning authorities should apply the following principles: <ul style="list-style-type: none"> (a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;” 	Comment noted. The mitigation hierarchy is set out within the policy wording. The plan and policies when read as a whole is considered to reflect this advice at paragraph 180a.
Inconsistent application of policy		



Delivery Policy ES8 - Trees, hedgerows and woodlands		
474	<ul style="list-style-type: none"> Many contradictions with PS37 site 	<p>The Council considers Strategic Site Allocation PS37 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>On-site specifics; including tree, hedgerow and woodland conservation, strategic landscape buffering and enhancement works, to be addressed at the masterplan/ planning application stage.</p>
<p>Policy wording modifications: None</p>		



Delivery Policy ES9 - Equestrian development			
Number of representations: 4		Support: 4	
Stakeholders		Comments	
		Stroud District Council Response	
Support			
Sport England (133)	<ul style="list-style-type: none"> The keeping of horses for leisure and recreational purposes.... should be changed to The keeping of horses for leisure, sport and recreational purposes.... 	The Council will consider small factual modifications where necessary.	
	<ul style="list-style-type: none"> England has produced many world class equestrian sports men and women, including HRH Princess Anne, Charlotte, Dujardin, Sir Mark Todd and Beezie Madden, to name but 4. As mentioned previously sport is a major economic generator and this should be recognised in this section. 	Comment noted	
	Policy wording modifications:		
	<ul style="list-style-type: none"> The keeping of horses for leisure and recreational purposes.... should be changed to The keeping of horses for leisure, sport and recreational purposes.... 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.	
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> Support this policy and welcomes the addition of the requirement for developments to avoid 'Changes in grazing regime that affect ecological diversity of grassland'. Important areas of priority grassland habitat that would have formed core areas of the Nature Recovery Network have historically been lost to inappropriate equestrian activities. This policy should help to conserve such site, in-line with the Council's NERC Act duties. 	Comment noted	
	Policy wording modifications: None		
Object			
No comments received			
		Policy wording modifications: None	



Delivery Policy ES9 - Equestrian development		
Comment		
No comments received		
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		



Delivery Policy ES10 - Valuing our historic environment and assets				
Number of representations: 14		Support: 5	Object: 1	Comment: 8
Stakeholders	Comments		Stroud District Council Response	
Support				
Savills (UK) Limited for The Berkeley Estate (878)	<ul style="list-style-type: none"> Supports this policy in principle. It is important for SDC to carefully consider the significance of the Grade I listed Berkeley Castle and its Grade II* listed park and gardens, as well as the impact on existing farm tenants, local businesses and residents, when considering the potential implications of any new development. 		Comment noted	
Policy wording modifications: None				
Savills (UK) Limited for L & Q Estates (913)	<ul style="list-style-type: none"> The policy takes a positive approach to the protection and enhancement of heritage assets – and seeks to identify measures of local importance. Support the principle of 3(4) and the use of heritage assets within place making through the creation of views and vistas where appropriate. The policy emphasises the importance of considering the opportunities of views and vistas to inform design and place making. However, as currently drafted, it may read that all existing views to such an asset should be protected or enhanced. 'Protection of Views' is not in itself a heritage consideration; it is the assessment of the significance of these views within the wider setting of any heritage asset which is important in determining planning applications. Amend to clarify. 		<p>Comment noted</p> <p>Delivery Policy ES10 point 4 states that proposals will be supported which protect and, where appropriate, enhance key views and vistas. Point 4 notes that this is especially the case where locally distinctive landmark features (such as spires and towers of historic churches and mill chimneys) are concerned.</p> <p>The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy and guidance. Supporting text (6.67) highlights that national policy expects that the contribution of heritage assets to local character and sense of place is recognised and valued and that policies ensure they are conserved in a manner appropriate to their significance. Paragraphs 6.70-6.71 support Point 1 in requiring a (proportionate) explanation of an affected heritage asset's significance (including any contribution made by its setting, which can include the identification of key views and vistas), to ensure that development proposals have fully considered the conservation or enhancement of those heritage assets and their settings, in a manner appropriate to that significance.</p>	



Delivery Policy ES10 - Valuing our historic environment and assets		
Policy wording modifications: None		
Object		
Minchinhampton Parish Council (504)	<ul style="list-style-type: none"> Please refer to response at 2.8 with special regard to erosion and attendant pressures. 	Comments not relevant to this Policy.
	<ul style="list-style-type: none"> Comment on section 2.8 (Local Green Spaces and community facilities): Any development within, say, 5 kilometres of the Commons should be disregarded 	
Policy wording modifications: None		
Comment		
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> There is a need for the policy to better align with the NPPF. Part 5 of the Policy refers to any harm or loss to any heritage interest. This ignores the guidance in paragraph 193 of the NPPF (relating to designated heritage assets) and paragraph 197 (dealing with non-designated heritage assets). Part 5 of the policy is too broad and could encompass both designated and non-designated interests. 	<p>The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy and guidance. Specifically, ES10 point 5 reflects national policy for the consideration of development impacts on both designated and non-designated heritage assets, including harm or loss, set out in NPPF (para. 199-208) and NPPG (Reference ID: 18a-018-20190723 and 18a-019-20190723), which make clear that any harm to a designated heritage asset requires clear and convincing justification; and that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, as part of a balanced judgement.</p> <p>Supporting text (6.70-6.72) allows for a tailored level of detail and a proportionate approach in respect of ES10 points 1 and 5, relative to the significance of the heritage asset and the likely degree of harm. The Council considers that an element of justification, incorporated into a Heritage Statement (6.71) is a necessary and justified requirement in order to inform the balanced judgement that is required by the NPPF in respect of non-designated heritage assets.</p>
	Policy wording modifications: None	
RPS Group for Stroud Corporation NV (917)	<ul style="list-style-type: none"> This policy now supports proposals which protect and, where appropriate, enhance key views and vistas, especially of locally distinctive landmark features such as mill chimneys. Recognise that mill chimneys can be a locally distinctive landmark 	Delivery Policy ES10 point 4 states that proposals will be supported which protect and, where appropriate, enhance key views and vistas. Point 4 notes that this is especially the case where locally distinctive landmark features (such as spires and towers of historic churches and mill chimneys) are concerned.



Delivery Policy ES10 - Valuing our historic environment and assets		
	<p>feature. However, the protection and enhancement of these landmark features will depend on site specific circumstances and other site constraints.</p> <ul style="list-style-type: none"> Recommend that the policy should allow for greater flexibility on the development of landmark features. 	<p>The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy and guidance. Supporting text (6.67) highlights that national policy expects that the contribution of heritage assets to local character and sense of place is recognised and valued and that policies ensure they are conserved in a manner appropriate to their significance. Paragraphs 6.70-6.71 support Point 1 in requiring a (proportionate) explanation of an affected heritage asset’s significance (including any contribution made by its setting, which can include the identification of key views and vistas), to ensure that development proposals have fully considered the conservation or enhancement of those heritage assets and their settings, in a manner appropriate to that significance.</p>
Policy wording modifications: None		
BBA Architects for Vistry Group (912)	<ul style="list-style-type: none"> Support policies which seek to preserve, protect or enhance historic assets. Such policies must be in accordance with national planning policy. Point 5 of delivery policy ES10 does not take into account the NPPF policy in relation to the weighing of proposals that needs to take place depending on the type of heritage asset (designated or undesignated) or the level harm that would be caused by any proposed development. The wording is inconsistent with national planning policy and should be deleted. 	<p>The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy and guidance. Specifically, ES10 point 5 reflects national policy for the consideration of development impacts on both designated and non-designated heritage assets, including harm or loss, set out in NPPF (para. 199-208) and NPPG (Reference ID: 18a-018-20190723 and 18a-019-20190723), which make clear that any harm to a designated heritage asset requires clear and convincing justification; and that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, as part of a balanced judgement.</p> <p>Supporting text (6.70-6.72) allows for a tailored level of detail and a proportionate approach in respect of ES10 points 1 and 5, relative to the significance of the heritage asset and the likely degree of harm. The Council considers that an element of justification, incorporated into a Heritage Statement (6.71) is a necessary and justified requirement in order to inform the balanced judgement that is required by the NPPF in respect of non-designated heritage assets.</p>
Policy wording modifications:		
	<ul style="list-style-type: none"> Delete the following wording: 'Any harm or loss 	All suggested site policy wording modifications will be considered by the



Delivery Policy ES10 - Valuing our historic environment and assets		
	would require clear and convincing justification to the relevant decision-maker as to why the heritage interest should be overridden'	Inspectors at the EIP.
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> There is a need for the policy to better align with the NPPF. Part 5 of the Policy refers to any harm or loss to any heritage interest. This ignores the guidance in paragraph 193 of the NPPF (relating to designated heritage assets) and paragraph 197 (dealing with non-designated heritage assets). Part 5 of the policy is too broad and could encompass both designated and non-designated interests. 	<p>The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy and guidance. Specifically, ES10 point 5 reflects national policy for the consideration of development impacts on both designated and non-designated heritage assets, including harm or loss, set out in NPPF (para. 199-208) and NPPG (Reference ID: 18a-018-20190723 and 18a-019-20190723), which make clear that any harm to a designated heritage asset requires clear and convincing justification; and that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, as part of a balanced judgement.</p> <p>Supporting text (6.70-6.72) allows for a tailored level of detail and a proportionate approach in respect of ES10 points 1 and 5, relative to the significance of the heritage asset and the likely degree of harm. The Council considers that an element of justification, incorporated into a Heritage Statement (6.71) is a necessary and justified requirement in order to inform the balanced judgement that is required by the NPPF in respect of non-designated heritage assets.</p>
Policy wording modifications: None		
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> There is a need for the policy to better align with the NPPF. Part 5 of the Policy refers to any harm or loss to any heritage interest. This ignores the guidance in paragraph 193 of the NPPF (relating to designated heritage assets) and paragraph 197 (dealing with non-designated heritage assets). Part 5 of the policy is too broad and could encompass both designated and non-designated interests. 	<p>The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy and guidance. Specifically, ES10 point 5 reflects national policy for the consideration of development impacts on both designated and non-designated heritage assets, including harm or loss, set out in NPPF (para. 199-208) and NPPG (Reference ID: 18a-018-20190723 and 18a-019-20190723), which make clear that any harm to a designated heritage asset requires clear and convincing justification; and that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, as part of a balanced judgement.</p> <p>Supporting text (6.70-6.72) allows for a tailored level of detail and a</p>



Delivery Policy ES10 - Valuing our historic environment and assets		
		proportionate approach in respect of ES10 points 1 and 5, relative to the significance of the heritage asset and the likely degree of harm. The Council considers that an element of justification, incorporated into a Heritage Statement (6.71) is a necessary and justified requirement in order to inform the balanced judgement that is required by the NPPF in respect of non-designated heritage assets.
Policy wording modifications: None		
RCA Regeneration Ltd for Piper Homes (877)	<ul style="list-style-type: none"> This policy does not adequately define in what circumstance archaeology works would be required, giving the impression that this would be required on every site in all circumstances. This would appear an overly onerous validation requirement, given that a programme of works is often negotiated with archaeology officers and only where there is cause to do so. 	<p>Delivery Policy ES10 Point 1 sets out that: Any proposals involving a historic asset shall require a description of the heritage asset's significance, including any contribution made by its setting, and an assessment of the potential impact of the proposal on that significance, using appropriate expertise. This can be a desk based assessment and a field evaluation prior to determination where necessary and should include the Gloucestershire Historic Environment Record.</p> <p>Supporting text 6.70-6.71 explains the circumstances in which such a Heritage Statement will be required.</p>
Policy wording modifications: None		
RCA Regeneration Ltd for Land Development and Estates Ltd (861)	<ul style="list-style-type: none"> This policy does not adequately define in what circumstance archaeology works would be required, giving the impression that this would be required on every site in all circumstances. This would appear an overly onerous validation requirement, given that a programme of works is often negotiated with archaeology officers and only where there is cause to do so. 	<p>Delivery Policy ES10 Point 1 sets out that: Any proposals involving a historic asset shall require a description of the heritage asset's significance, including any contribution made by its setting, and an assessment of the potential impact of the proposal on that significance, using appropriate expertise. This can be a desk based assessment and a field evaluation prior to determination where necessary and should include the Gloucestershire Historic Environment Record.</p> <p>Supporting text 6.70-6.71 explains the circumstances in which such a Heritage Statement will be required.</p>
Policy wording modifications: None		
Historic England (813)	<p>Partial effectiveness of ES10 in relation to allocated sites with heritage sensitivities:</p> <ul style="list-style-type: none"> The Plan proposes generic place making and heritage policy, and a requirement for master planning, and 	The Council has a signed Statement of Common Ground with Historic England, set out within the Duty to Cooperate Statement (EB3). As part of this agreement, "The parties agree to work together and commit to investigating further discrete evidence where appropriate and to work together through



Delivery Policy ES10 - Valuing our historic environment and assets		
	<p>this may help to ensure that the significance of heritage assets in relation to these development sites may be appropriately conserved.</p> <ul style="list-style-type: none"> • However, the SA underlines the value and importance of explicit advice in the SALA to guide the form of future development and minimise harm. However, we note that this advice is not necessarily carried forward and included in the Plan. • Without explicit reference in the Plan to these specific recommendations from the evidence base, there is a risk they will not be appreciated by prospective developers, nor given appropriate weight and applied. We would therefore suggest that consideration is given to inclusion of these conditions from the evidence base into the body of the Plan to provide clarity and certainty ensuring that the significance of designated assets is sustained. 	<p>the examination process to resolve the outstanding matters by agreeing appropriate modifications to the Local Plan where necessary.”</p>
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		



Delivery Policy ES11 - Maintaining, restoring and regenerating the District's canals				
Number of representations: 8		Support: 5	Object: 0	Comment: 3
Stakeholders	Comments		Stroud District Council Response	
Support				
The Canal & River Trust (496)	<ul style="list-style-type: none"> The Canal & River Trust support this policy and look forward to future involvement in the canal Strategy, which must cover all canals within the district. 		Support noted.	
Policy wording modifications: None				
Object				
No comments received				
Policy wording modifications: None				
Comment				
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> Welcomes the commitment to producing a strategy for the canal restoration. It should be made explicit in the policy that the canal restoration itself must not have a significant adverse impact on designated biodiversity sites or core parts of local ecological networks (the NRN). This is necessary to make the policy legally compliant with the Council's NERC Act duties, the NPPF and incoming requirements of the Environment Bill. Whilst notable biodiversity enhancements are being delivered through phase 1b, phase 3 would impact a number of SSSI's, Local Wildlife Sites and important populations of protected species. 		<p>Support noted for the Canals Strategy.</p> <p>The policy makes clear that any developments adjacent to the canals must respect their biodiversity value and improvements to canals will include enhancement of their biodiversity value.</p> <p>The SDLP must be read as a whole and whilst appreciating the specific concerns of the Trust regarding the canal restoration project, it is not necessary to include the detail recommended for this policy in the representation as Policy ES6 covers all of these points for all types of development, which would include canal restoration.</p>	
Policy wording modifications:				
	<ul style="list-style-type: none"> It should be made explicit in the policy that the canal restoration itself must not have a significant adverse impact on designated biodiversity sites or core parts of local ecological networks (the NRN). 		All suggested policy wording modifications will be considered by the Inspectors at the EIP.	
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> The concern with the policy is that the third paragraph requires that development "adjacent" to the canal has regard to improving and enhancing 		It is acknowledged that development cannot improve or enhance views relating to adjacent land parcels outside the developer's control. That is why the policy does not require development to do so but requires developers to	



Delivery Policy ES11 - Maintaining, restoring and regenerating the District’s canals			
	views along it. This fails to consider land control where a development is ‘adjacent’ to a canal but does not have full control of the land up to the canal edge. This can be rectified with amendments to the Policy seeking such improvements “where possible”.	“have regard to” making these improvements.	
	<ul style="list-style-type: none"> In terms of financial contributions for canal related restoration, the concern is that they must be justified against the tests in the NPPF. 	Each case needs to be considered on its merits. The tests are set out in the NPPF and do not need to be set out within the policy or supporting text.	
Policy wording modifications:			
	<ul style="list-style-type: none"> The concern with the policy is that the third paragraph requires that development “adjacent” to the canal has regard to improving and enhancing views along it. This can be rectified with amendments to the Policy seeking such improvements “where possible”. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.	
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> The concern with the policy is that the third paragraph requires that development “adjacent” to the canal has regard to improving and enhancing views along it. This fails to consider land control where a development is ‘adjacent’ to a canal but does not have full control of the land up to the canal edge. This can be rectified with amendments to the Policy seeking such improvements “where possible”. 	It is acknowledged that development cannot improve or enhance views relating to adjacent land parcels outside the developer’s control. That is why the policy does not require development to do so but requires developers to “have regard to” making these improvements.	
	<ul style="list-style-type: none"> In terms of financial contributions for canal related restoration, the concern is that they must be justified against the tests in the NPPF. 	Each case needs to be considered on its merits. The tests are set out in the NPPF and do not need to be set out within the policy or supporting text.	
	Policy wording modifications:		
	<ul style="list-style-type: none"> The concern with the policy is that the third paragraph requires that development “adjacent” to the canal has regard to improving and enhancing views along it. This can be rectified with amendments to the Policy seeking such improvements “where possible”. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.	



Delivery Policy ES11 - Maintaining, restoring and regenerating the District's canals		
Other representations	Issues raised	Stroud District Council Response
Canal Maintenance		
214	<ul style="list-style-type: none"> This is an important Policy but suggest that it be expanded to detail the maintenance of the canal once re-opened. 	The SDLP is primarily a land use and development focussed document. Matters of maintenance are not generally a planning matter.
Policy wording modifications: None		
214	<ul style="list-style-type: none"> Expand the policy to cover the maintenance of the canal once re-opened. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.





Delivery Policy ES12 - Better design of places			
Number of representations: 6		Support: 1	Object: 0
Stakeholders		Comments	Stroud District Council Response
Support			
No comments received		Policy wording modifications: None	
Object			
No comments received		Policy wording modifications: None	
Comment			
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> Question the need for the Policy, given that it repeats several points raised in other policies. 	Policy wording modifications: None	The SDLP as a whole seeks to signpost particular qualities and considerations that may influence the design of individual sites, through a framework of complementary policies.
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> Question the need for the Policy, given that it repeats several points raised in other policies. 	Policy wording modifications: None	Delivery Policy ES12 is a broad, directional policy, which reiterates aspects and touches upon criteria contained in other policies, some of which apply to a limited range or circumstances or a defined type of development (e.g. strategic sites, CP5; new housing development, CP8; or individual site allocation policies). Requirements set out in Delivery Policy ES12 apply to all new development and the policy establishes that better design of places is important in all cases, whether small infill or an extensive development scheme (supporting text 6.79).
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> Question the need for the Policy, given that it repeats several points raised in other policies. 	Policy wording modifications: None	
RPS Group for Redrow Homes (948)	<ul style="list-style-type: none"> Support to ensure that all new developments within the District are well designed, but the policy is very ambiguous and could require developers to respond to a whole plethora of design codes and policies contained in a number of documents which may not necessarily complement each other. The strategic sites in the eSDLP each have their own site specific and tailored policy requirements, including in many cases the requirement for a comprehensive Masterplan and Development Brief. It is therefore 		



Delivery Policy ES12 - Better design of places		
	<p>considered that the strategic sites should not have to then conform to a number of other more generalised design documents. It should be made clear that Policy ES12 relates to all development proposals within the District apart from the allocated Strategic Sites.</p>	
	<p>Policy wording modifications:</p>	
	<ul style="list-style-type: none"> It should be made clear that Policy ES12 relates to all development proposals within the District apart from the allocated Strategic Sites which already have their own site specific and tailored policy requirements. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
<p>Pegasus Group for Robert Hitchens Ltd (879)</p>	<ul style="list-style-type: none"> Whilst the concerns are not necessarily a soundness issue it is noted that Core Policy 4, states that “all development proposals shall accord with the Mini Visions and have regard to the guiding principles for that locality” as set out in the Plan, and shall be informed by other relevant documents, such as any design statements adopted as Supplementary Planning Documents (SPD). However, under Delivery Policy ES12, all new development must be based on thorough site appraisal including reference to any adopted Design Statements, Design Codes, Neighbourhood Development Plans and Secured by Design standards. It is considered that references to guidance and SPDs should not be interpreted as conveying the weight of a Development Plan Document onto guidance, particularly as such documents have not been subject to examination and does not form part of the Local Plan. These references should be removed. If this text is then included in the supporting text to the policy, the text should be clear that development proposals should “have regard to” rather than “accord with” any such standards and guidance. 	<p>The council considers the ES12 policy requirement to “refer” to available adopted guidance (Design Statements, Design Codes, Neighbourhood Development Plans and Secured by Design standards), and to “accord” with relevant advice (supporting text 6.80) to be a necessary and justified requirement of site appraisal, informing site development briefs, the masterplanning process and detailed design. This does not conflict with the CP4 requirement for all development proposals to “be informed by” relevant documents including SPD design statements.</p> <p>The SDLP as a whole seeks to signpost particular qualities and considerations that may influence the design of individual sites. Core Policy CP4 establishes broad place-making principles and a general approach of grounding context-based design responses in the distinct qualities, issues, constraints and opportunities that exist in different parts of the District. The approach is supported through Delivery Policy ES12 Better Design of Places; whilst locality- and site-specific considerations, characteristics and requirements are articulated throughout Chapter 3 Making Places, via the parish cluster Mini Visions, Guiding Principles, settlement summaries and individual site allocation policies.</p> <p>Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing Supplementary Planning Documents (SPDs); and National Planning Practice Guidance (Paragraph: 008 Reference ID: 61-008-20190315) states that SPDs</p>



Delivery Policy ES12 - Better design of places		
		should build upon and provide more detailed advice or guidance on policies in an adopted local plan.
	Policy wording modifications:	
	<ul style="list-style-type: none"> References to guidance and SPDs should be removed from the policy wording; If this text is then included in the supporting text to the policy, the text should be clear that development proposals should “have regard to” rather than “accord with” any such standards and guidance. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		





Delivery Policy DES2 - Green Infrastructure				
Number of representations: 7		Support: 4	Object: 1	Comment: 2
Stakeholders	Comments		Stroud District Council Response	
Support				
Natural England (864)	<ul style="list-style-type: none"> Welcome this policy for the important role it has in supporting the protection, management, creation and delivery of this multifunctional resource. Multifunctional green infrastructure (GI) (including blue infrastructure) serves to link and buffer habitats and species from the landscape scale right up to people’s doorsteps and, as a result, providing people with opportunities for contact with nature, with positive benefits for both physical and mental well-being. The resource has a critical role to play in safeguarding ecosystem services (promoting clean air and water and healthy soils) and addressing climate change impacts, through helping to regulate temperatures and carbon storage. Natural England is leading the Green Infrastructure Standards project. Research within the project has identified key benchmarks that are informing the update of Accessible Natural Greenspace Standards (ANGSt). We’re also developing the first official England-wide map of GI. The new standards are programmed for a launch in the Summer next year to contribute to any proposed Supplementary Planning Document on this subject. 		Comment noted. Welcome potential involvement with GI Standards project and ANGSt review working with Natural England.	
Policy wording modifications: None				



Delivery Policy DES2 - Green Infrastructure		
Object		
National Trust (304)	<ul style="list-style-type: none"> Largely supportive of the provisions in this policy but want to ensure that it would work effectively in practice. Para 171 of the NPPF states that plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure. The Trust owns and manages a number of sites which provide green infrastructure and ecological value within Stroud District. These places are increasingly under pressure from visitor footfall and recreational impacts. Policy DES2 contains various provisions that development proposals should protect existing green infrastructure, increase its value as a habitat value, cater for anticipated increases in demand arising from new development, and where there a negative impact on green infrastructure or ecological networks is unavoidable, should demonstrate mitigation measures or replacement green infrastructure. However, the Local Plan Review proposes a significant scale of new housing developments that could (individually and cumulatively) adversely affect many sensitive green infrastructure sites. This will not remove the 'draw' of sites in the Cotswolds AONB. 	<p>Comment noted. The Stroud District Evidence base identifies GI provision and provides analysis of these assets including functionality and access (EB41a-j inclusive). Managing recreational pressure also applies to biodiversity national sites such as SPA/SAC and/or RAMSAR. The Council already works with the National Trust as landowner on Rodborough SAC and Cotswold Beechwoods SAC through mitigation strategy funded projects.</p>
	<ul style="list-style-type: none"> Want to see the policy – or the accompanying text – being more specific about the identification and delivery of replacement green infrastructure, mitigation measures and approved strategic green infrastructure projects. Reference is made to the Green Infrastructure County-wise Strategy (2015) and the LNP Nature Recovery Network, but are less clear as to how any potential developer contributions and mitigation strategies might be channelled and 	<p>Consider the Local Plan and the accompanying evidence base provides a clear steer on GI provision. Existing planning obligation and planning condition tests provide a framework for securing mitigation commensurate with new development.</p>



Delivery Policy DES2 - Green Infrastructure		
	<p>deployed to reduce and mitigate the impacts of new housing development.</p> <ul style="list-style-type: none"> • Would like to see the accompanying text referring to a delivery objective of increasing the level of GI commensurate with the scale of new housing development. 	
Policy wording modifications: None		
Comment		
RPS Group for Stroud Corporation NV (917)	<ul style="list-style-type: none"> • This new policy seeks to protect existing green infrastructure, improve access to and connectivity between existing and planned green infrastructure to develop a continuous right of way and greenway network and integrated ecological systems and networks. Recommend this policy should recognise the site-specific circumstances and constraints when considering the development of green infrastructure at development sites. 	Comment noted. Each planning application is considered on its own merits taking account of any material considerations.
Policy wording modifications: None		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> • Welcome the specific GI policy but would benefit from being better integrated into the place making policies of the plan, rather than an add-on. Cross reference this to policy CP5 and the use of Building with Nature or similar GI standards is important to provide clarity to developers. Supports the commitments to increasing the functionality of GI and increasing its biodiversity value. This aligns well with national policy. 	Comments noted. The Council considers that the Local Plan should be read as a whole and that cross referencing policies is unnecessary. The importance and benefits of GI is recognised by this new policy.
Policy wording modifications		
	<ul style="list-style-type: none"> • One correction is that the Nature Recovery Network was created and is maintained and updated by GWT rather than then LNP, although the LNP has adopted it. The county-wide framework for GI is helpful, but what is more important is how this translates into 	<p>Comment noted. The Council will enter into dialogue accordingly and will consider small modifications if necessary.</p> <p>The Council considers that the Local Plan when read as a whole provides policy safeguards for recreational pressure, including its HRA evidence (EB85)</p>



Delivery Policy DES2 - Green Infrastructure		
	<p>spatial planning across boundaries. Particularly for ecological and natural capital networks this cannot be a subjective design process with varying methodologies.</p> <ul style="list-style-type: none"> The recognised GI assets in the district are some of the most sensitive designated biodiversity sites in the county. There is strong evidence that they are being degraded by recreational pressure, so the GI strategy needs a commitment and an objective to address this by creating SANGs. 	and accompanying mitigation strategies.
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		



ES16

Delivery Policy ES16 - Public art contributions		
Number of representations: 5	Support: 1	Object: 1
Stakeholders	Comments	Stroud District Council Response
Support		
No comments received	Policy wording modifications: None	
Object		
Home Builders Federation (HBF) (892)	<ul style="list-style-type: none"> Delivery Policy ES16 The level of contribution will be negotiated on an individual basis dependent upon the nature of the development proposal and the impact of this requirement on the economic viability of the development proposal. It is assumed that the Council proposes to require public art contributions by legal agreement and / or planning condition. As set out in the 2019 NPPF, an otherwise unacceptable development can be made acceptable by using planning conditions or obligations. The Council should provide evidence to justify the reasons that residential development without contributions to public art is unacceptable. Planning conditions should only be imposed where they are necessary and relevant (para 55) whilst planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition (para 54). The 2019 NPPF also sets out three tests to be met when a planning obligation is sought (para 56). This policy requirement does not pass all three tests. In the Council’s viability assessment costs for public art contributions are assumed to be included in the £5,000 S106 contribution allowance (para 8.102). However, no evidence has been provided to justify this assumption. It is unclear if historically S106 	<p>Art can help in enhancing the appearance of both buildings and their setting, the quality of the environment and can help promote culture and civic pride, benefitting general health and wellbeing. Public art may take many forms including art installations and sculptures, seating, signage and landscape design or it may be integrated as a functional element of a development through metalwork, lighting, floor and window designs.</p> <p>The level of contribution will be negotiated on an individual basis dependent upon the nature of the development proposal, taking into account the impact of this requirement on the economic viability of the development proposal, this allows a flexible approach rather than a blanket amount which may impact site viability.</p> <p>The Council’s Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p>



Delivery Policy ES16 - Public art contributions		
	<p>Agreements have included a financial contribution to public art.</p> <ul style="list-style-type: none"> • Delivery Policy ES16 is unsound and should be deleted. 	
Policy wording modifications: None		
Comment		
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> • The policy is unsound as it does not provide a framework for determining exactly how public art contributions are calculated and what is considered 'proportionate'. 	The level of contribution will be negotiated on an individual basis dependent upon the nature of the development proposal, taking into account the impact of this requirement on the economic viability of the development proposal, this allows a flexible approach rather than a blanket amount which may impact site viability.
Policy wording modifications: None		
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> • The policy is unsound as it does not provide a framework for determining exactly how public art contributions are calculated and what is considered 'proportionate'. 	The level of contribution will be negotiated on an individual basis dependent upon the nature of the development proposal, taking into account the impact of this requirement on the economic viability of the development proposal, this allows a flexible approach rather than a blanket amount which may impact site viability.
Policy wording modifications: None		
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> • The policy is unsound as it does not provide a framework for determining exactly how public art contributions are calculated and what is considered 'proportionate'. 	The level of contribution will be negotiated on an individual basis dependent upon the nature of the development proposal, taking into account the impact of this requirement on the economic viability of the development proposal, this allows a flexible approach rather than a blanket amount which may impact site viability.
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
No comments received		
Policy wording modifications: None		

