

Matter 2 Spatial Strategy and site selection methodology

Issue 2 – Does the Plan set out an appropriate spatial strategy, taking into account reasonable alternatives? Has the site selection process used an appropriate methodology that is based on proportionate evidence?

(Please note that these questions relate to the overall spatial strategy and the site selection methodology. Further questions on unmet needs and specific site allocation are set out under later matters.)

Vision and objectives

1. Does the Plan set out a suitably positive and realistic vision for the future development of the District as a whole?

2.1.1 The Council considers the plan does set out a suitably positive and realistic vision for the future development of the District as a whole. Set out on page 19 of the Plan, the vision is a broad and over-arching vision, which expresses aspirations for the future of our District, building on the vision contained in the 2015 Local Plan, drawn from issues arising in our evidence base and refined through public consultation. The vision offers an aspirational glimpse of the future: something that we can all work towards and a goal that will continue to guide future policy and strategy.

2. What is the purpose of the ‘Mini Visions’ referred to in Core Policy CP4 and set out under each sub-area of the Plan? Do Maps 5-12 within the Plan reasonably reflect the spatial visions for each sub-area? Are these visions justified and do they adequately reflect the overarching Plan vision?

2.2.1 Derived from the District-wide vision, the Plan also sets out a series of eight place making ‘mini visions’ which reflect the distinct qualities, issues, constraints and opportunities that exist in different parts of the overall area. They set out the envisaged and desired effects that the development strategy should have on particular parts of the District.

2.2.2 Whilst some places in the District have a need for development or are suited to strategic levels of growth, others are not. The spatial vision identifies areas that are likely to see significant changes; and areas that will not. It pictures what the various levels of change or growth could mean for the District’s diverse communities, settlements and landscapes. It sets out the envisaged and desired effects that the development strategy should have on particular parts of the district, including information about the proposed strategic growth areas and local sites, the kind of development that could happen at each place and how this is intended to help achieve the overall vision for the District’s future.

2.2.3 The Council considers that maps 5-12 reflect in picture format the spatial vision for the eight cluster areas up to 2040.

2.2.4 The Council consider the eight cluster visions to be justified in that they aim to focus the over-arching goals of the main Plan vision and the strategic objectives in a way that responds more specifically to local priorities, issues and needs.

3. Have the seven strategic objectives (S01, S01a and S02-S06), included in Chapter 2 of the Plan, been positively prepared, are they justified and are they consistent with the overall vision and the priority issues facing the District?

2.3.1 The Council considers the seven strategic objectives to have been positively prepared and are justified. Having originated from the 2015 Local Plan, the Council has refined the strategic objectives by consulting and considering views and recommendations through two consultations: the Issues and Option (EB104) and Emerging Strategy (EB105). The objectives were also reviewed having regard to the Council's Sustainability Appraisal and national policy.

2.3.2 The Council considers the strategic objectives to be consistent with the overall vision and priority issues facing the District. Building on the key issues set out in the adopted Local Plan 2015 and based on Stroud District Council's five Key Priorities (Corporate Delivery Plan 2018-22), the Council identified 40 key issues, challenges and needs facing the District for the Local Plan review to address. These formed the basis of the 2017 Issues and Options consultation (EB104, CD4a). At the Emerging Strategy Stage (EB105, CD4b, CD4c), the Council undertook further consultation, asking whether it had correctly identified the Top 5 issues. Taking account of the identified issues and priorities, the seven strategic objectives provide a more tangible way of taking forward the overall vision for the District, and to help us to assess the relative merits of potential locations for strategic growth.

Spatial strategy

The Framework states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places (paragraph 20). Chapter 2 of the Plan sets out the Development Strategy and a number of 'development strategy headlines' are also set out in text (page 23).

The Plan identifies, in the supporting text for Core Policy CP2, that the objectively assessed needs of the District for the period 2020-2040 will be met through a strategy which concentrates most development at a series of strategic sites to be 'located at the principal settlements within the District, at new settlements and within the key employment property market areas...'. Smaller scale development is expected to come forward in accordance with the settlement hierarchy. However, the policy mainly just lists the proposed strategic growth and development locations.

Core Policy CP4 is described as 'Making Places: a Spatial Vision for Stroud District'. It sets out a number of development principles which appear to be covered by other policies within the Plan.

4. Is the spatial strategy justified by robust evidence and does it promote a sustainable pattern of development within the District, in accordance with paragraph 11 of the Framework? Is the Council decision as to why this development distribution option was selected, sufficiently clear?

2.4.1 At submission of the Stroud District Local Plan Review (SDLP) in October 2021, the Council published a Topic Paper: The Development Strategy (the Topic Paper) (Examination Library Document EB4).

2.4.2 The Topic Paper explains how the Council, in preparing the SDLP, has identified, assessed and chosen a development strategy that sets out a sustainable pattern and scale of development to meet future needs.

2.4.3 The generation and selection process was underpinned by a solid evidence base. In summary, the following evidence underpinned the process:

- A Stroud District Settlement Role and Function Study (EB71 and EB72) was prepared which compared each town and village against a range of criteria, including settlement size, employment role, access to retail and community facilities. This work helped to determine the most sustainable existing settlements, thereby enabling the Council to critically review the adopted Local Plan hierarchy and to establish a 'case for growth' for each settlement;
- An initial range of spatial options for growth based upon the hierarchy of existing settlements but allowing for new settlements was tested through an independent Sustainability Appraisal process against 17 sustainability objectives and reported in Sustainability Appraisal Findings for the Stroud Local Plan Review Policy Options (EB76). This process helped to support a strategy based on concentrated growth rather than dispersal and the generation of a hybrid option;
- We felt it was important to analyse these strategy options using a range of actual sites we had already assessed as being suitable, available and achievable through our robust Strategic Assessment of Land Availability (SALA) process. A working paper Local Plan Review: Developing a preferred strategy (EB73) explains how we apportioned sites to the four spatial strategy options. This work enabled the Council to conclude that it would not be possible to meet development needs solely through a dispersal option;
- Working with Highways England and Gloucestershire County Council we prepared a Strategy Options Transport Discussion Paper (EB59/60) to examine the transport implications of the four spatial options. This work supported a strategy based on concentrated growth;
- The SALA and associated landscape work highlighted that the Tier 1/2 towns of Stroud, Dursley and Wotton-Under-Edge are highly constrained by their proximity to the Cotswolds AONB and that it was therefore unlikely to be possible to meet development needs purely through a concentrated development strategy at Tier 1/2 settlements alone;

- Further research into the location of existing and likely future commercial markets and the particular needs of employment sectors within Stroud District helped to further refine the emerging development strategy. From the Gloucestershire Economic Needs Assessment (EB29) and Stroud District Employment Land Review (EB30) six key segments of market demand were identified for future employment land supply to satisfy. This work enabled the development strategy to ensure that the spatial needs of our economy could be met at key property market locations.
- An emerging hybrid strategy was subject to further Sustainability Appraisal at the Emerging Strategy and Draft Local Plan stages. The results were published (policy-on) in the Sustainability Appraisal Findings for the Stroud Local Plan Emerging Strategy Paper (EB78) and the Sustainability Appraisal Findings for the Stroud Local Plan Draft Plan (EB79) and (policy-off) in The Sustainability Appraisal Findings for the Stroud Local Plan Review Policy Additional Housing Options (EB80). This work confirmed that a hybrid approach based on concentrated growth would best meet the housing requirements and identified mitigation measures to address remaining negative effects;
- The potential need to find additional land, following the Government's review of the standard housing method in 2020, resulted in the generation of four broad spatial options underpinned by a reassessment of existing and additional SALA sites promoted at the Draft Plan stage. The options were subject to further Sustainability Appraisal in Sustainability Appraisal Findings for the Stroud Local Plan Review Additional Housing Options (EB80). This work confirmed that if additional land was required, options involving intensification of existing sites and an additional growth point performed the best;
- The final development strategy set out within the Pre-Submission SDLP involved some fine-tuning, including further intensification at existing draft allocation sites and support for the regeneration of the Stroud Valleys corridor and the regeneration of the Berkeley/Sharpness area, both underpinned by on-going regeneration and place-making projects. Sustainability Appraisal of the final strategy is set out within the Sustainability Appraisal Findings for the Stroud Local Plan Review Pre-Submission (CD3).

2.4.4 Throughout this process, the Council undertook public consultation to seek views on the generation and testing of potential strategy options. It is important to note that at the Issues and Options stage, before particular sites had been identified by the Council as being preferred, the greatest support was for a strategy based on concentrated growth, with similar levels of support for the other three options (Issues and Options Consultation Report CD4a). Some respondents suggested an alternative option, generally supporting a hybrid approach of two or more of the initial four options. Other suggestions for a future growth strategy included focusing development along the major transport corridors, close to employment areas and/or on brownfield land. We considered these suggestions as part of the development of the subsequent hybrid strategy approach and reviewed, in

particular, the notion of a corridor approach to growth at the later Additional Housing Options stage.

2.4.5 Whilst we rejected a development strategy based primarily on a dispersal approach, we were mindful of concerns expressed by local people during the process about allowing some flexibility to meet specific local development needs and to maintain social sustainability. To address the specific concerns of smaller more dispersed communities (eventually defined as tiers 3b, 4a and 4b settlements), we developed a policy framework for providing for specific demographic issues or local needs through a broadened small sites exceptions policy, rather than by distributing more general growth requirements.

2.4.6 In conclusion, the solid evidence base supporting the proposed development strategy established the most sustainable settlements for further growth, the most sustainable pattern for growth and included sustainability appraisal at every stage, to test the strategy against key sustainability criteria and to propose appropriate mitigation measures.

2.4.7 It must not be forgotten that the NPPF paragraph 11 refers to a sustainable pattern of development that seeks to meet the development needs of the area. As the Topic Paper articulates at a number of different stages, the Council always assessed theoretical strategy options with regard to the development capacity of each option. Given the challenging minimum housing requirement set out by the standard method, this was a key factor in rejecting both a purely dispersed strategy distribution option and a purely concentrated growth option. The reality is that only a hybrid approach will meet the development needs of the area, but a hybrid approach based primarily upon concentrated growth.

5. Is the reliance on the delivery of most of the growth on a relatively small number of strategic development sites, including two new settlements, justified? How were the locations for the two new settlements at Sharpness and Wisloe identified and was the process robust?

2.5.1 The Topic Paper, as summarised in paragraph 2.1.3 above, explains how the assessment of spatial options through sustainability appraisal and through initial transport work consistently identified concentrated growth options (including new settlement options) as more sustainable than more dispersed spatial options. The summary sustainability appraisal tables set out in the Topic Paper on pages 10 and 14 clearly show the relative benefits of concentrated growth options relative to wider dispersal options.

2.5.2 Concentrated growth, provided that it is provided close to existing services and facilities and/or at appropriate growth locations, offers the following benefits, as set out in the Sustainability Appraisal (e.g. EB76) and Transport Discussion Paper (EB59):

- enough housing to ensure the housing stock meets the needs of local people;

- a smaller number of larger sites is likely to mean that high levels of affordable housing could be provided without significant impacts on viability;
- help ensure residents have access to a wide range of services and facilities and jobs, reducing the need for residents to travel longer distances and increasing self-containment;
- more opportunities to fund and sustain the critical mass to support passenger transport services and other transport infrastructure promoting modal shift and health and well-being as well as social inclusion;
- more opportunities for the incorporation of new infrastructure to support low carbon and renewable energies as well as sustainable waste management practices;
- fewer negative environmental impacts than dispersed growth, with opportunities for mitigation measures to reduce residual negative impacts;
- more likely to attract Government funding towards any required mitigation packages.

2.5.3 Concentrated growth also provides opportunities to increase significantly housing delivery rates. It is important to recognise the contribution that large scale site allocations and permissions set out in the adopted Stroud District Local Plan at West of Stonehouse (Great Oldbury), Littlecombe, North East Cam and Hunts Grove have had on elevating completion rates from the average achieved in the period 1991-2013 (382 dw/yr) to average completion rates of 575 dw/yr in the post adopted Plan period 2015-2022 (including individual completion rates of 745 dw/yr in 2020/21 and 771 dw/yr in 2021/22) (Published HLA Reports). The SDLP is proposing a new housing requirement of at least 630 dw/yr and the Council considers that it will need large scale sites to be able to deliver at this average rate for the Plan period.

2.5.4 In parallel with the assessment of potential spatial growth options through the plan making and SA process set out in the Topic Paper (EB4) and summarised above, the Council undertook a rigorous and systematic review of potential sites for allocation. For the initial Issues and Options Paper (EB104), the Council identified all sites which had been assessed as suitable, available and achievable through the 2017 SALA process. Similar SALA assessment work was carried out in 2018 informing the Emerging Strategy Paper, in 2019 informing the Draft Local Plan and in 2020 informing the Additional Housing Options stage.

2.5.5 The Topic Paper – Assessment & selection of sites (EB9) provides a detailed explanation of the SALA process and how it informed the plan making process. The SALA process is considered robust as it involved a “Call for Sites” invitation to landowners/developers at every stage, detailed assessment work using a range of evidence material, including heritage, ecology, landscape and accessibility assessment work and an approach to deliverability subject to a ‘health check’ by a panel of representatives from the development and property industry.

- 2.5.6 Through the SALA assessment work in 2017, the land adjacent to Newton/Sharpness was assessed as having future potential and therefore appeared in the Issues and Options Paper (EB104) both as a potential broader location to the south of the District (EB104 pages 26 and 27) and as potential sites for allocation adjacent to Newtown/Sharpness (EB104 page 55). The site at Wisloe had not been promoted for development at that stage and therefore did not appear in the Issues and Options Paper.
- 2.5.7 During 2018 land within the Wisloe area was promoted through the SALA process and whilst piecemeal development was not considered suitable, the SALA identified that there may be potential for a more planned and comprehensive development which would require additional land assembly. Following discussions between adjacent landowners, a comprehensive site promotion was agreed and the site appeared in the Emerging Strategy Paper (EB105) in 2018.
- 2.5.8 It should be noted that no other site of sufficient size to be identified as a potential new settlement was promoted through the SALA process between 2017 and 2019. A number of large sites were promoted as urban extensions to existing settlements and those which were assessed as being potentially suitable, available and achievable through the SALA process were considered through the plan making stages.
- 2.5.9 The SALA assessment process included input from the Council's Landscape Sensitivity Report (EB36) which assessed all of the land adjoining the Tier 1-3 settlements in the District for their capacity to accommodate housing and employment growth. However, this report did not consider all land beyond the main towns and villages which could potentially accommodate a new settlement.
- 2.5.10 In 2019 as part of a wider strategic project, the Council worked with neighbouring Gloucestershire authorities to assess broad areas for their future potential to accommodate strategic scale growth. The Final Report (EB17a) published in 2020 includes a detailed methodology for this work which included a series of assessment covering environmental constraints, transport and infrastructure and viability matters as well as a high level landscape sensitivity assessment of the District. The Report concludes "assessment areas 37, 47, 49, 52 and 53 have the potential to accommodate small villages (1,500-5,000 dwellings) without more than moderately adverse effects on landscape" (EB17a paragraph 3.7). Wisloe is located within parcel 49 and Sharpness within parcel 52.
- 2.5.11 The Final Report did not provide an evaluation of the relative merits of all broad areas or rank the sites, but recommended that selection should be "informed by a) the size of the objectively assessed need for housing and employment provision within the JCS and neighbouring authorities and b) the vision and objectives of the forthcoming JCS and other Local Plans."(EB17a paragraph 4.1). The Council followed this advice by finalising the overall development strategy and sites having regard to the overall scale of housing (and employment) need and by including an assessment of the performance of each potential site against the Plan's objectives, set out through the sustainability appraisal process.

- 2.5.12 In terms of detailed site matters, the Council took account of the findings in cross checking that large sites promoted and deemed suitable through the SALA process did not contravene any primary constraints and that secondary constraints could be addressed appropriately at plan making and/or development management stages.
- 2.5.13 The potential need to find additional land, following the Government's review of the standard housing method in 2020, resulted in the Council reviewing the evidence to identify any other potential new settlement broad locations for assessment. A site at Whitminster was promoted through the 2020 SALA process and following discussions with the Council's SA consultants, the Council undertook a review of SALA sites promoted along major transport corridors in the District. As a result, land at Moreton Valance, which included a number of smaller separate SALA sites, was identified by the Council as a potential broad location and this was subsequently promoted at the Additional Housing Options stage.
- 2.5.14 These additional large sites, as with all potential sites, both large and small, were subject to sustainability assessment in addition to going through the SALA process. The Sustainability Appraisal (CD3) includes an assessment of each site considered through the Plan process, (see in particular CD3b Appendices 5 and 7). A reasoned justification for the Council's decisions to allocate or not each site is included within the audit trail of Council decisions set out in Appendix 9.
- 2.5.15 In the Topic Paper (EB9) a summary SA table is included within Appendix 2 which sets out the policy-off sustainability appraisal findings for all of the large strategic sites allocated in the SDLP, together with the additional locations identified in 2020. A summary of the results of the SALA accessibility assessments (EB112) for these strategic sites is set out as an appendix to this Matter for convenience. The two tables demonstrate that the new settlement site at Wisloe performs relatively well against these other sites and the site at Sharpness performs no worse than, and in some cases better than, the two additional locations which came into the process later in 2020.

6. Is the strategy consistent with the settlement hierarchy and is the scale of development proposed at relevant settlements justified?

- 2.6.1 The initial generation of spatial options for the development strategy was based upon the classification of settlements set out in the adopted Local Plan's settlement hierarchy. See, for example, the explanation of the spatial options set out in the Issues and Options Paper (EB104) pages 21-23 and the key identifying the different tiers of settlements.
- 2.6.2 The final hybrid development strategy continues to closely reflect the settlement hierarchy. The development strategy headline's on page 23 of the SDLP (CD1) demonstrate how the strategy will "concentrate" development on the Tier 1 settlements of Cam and Dursley, Stonehouse and Stroud, with "modest" levels of growth at the Tier 2 settlements of Berkeley, Minchinhampton, Nailsworth and Painswick (paragraph 2.3.8) and "lesser" levels of growth at the Tier 3a villages

of Brimscombe & Thrupp, Eastington, Frampton-on-Severn, Kings Stanley, Kingswood, Leonard Stanley, North Woodchester and Whitminster (paragraph 2.3.9). At Tier 3b, 4a and 4b settlements, “small sites to meet specific needs” and to maintain “social sustainability” are identified (paragraph 2.3.12).

- 2.6.3 It should be noted that the references to the scale of growth set out in the development strategy headlines (see above underlined), are consistent with the scale of growth envisaged in Core Policy CP3. For example, Core Policy CP3 refers to Tier 1 settlements being the “focus for growth”, “modest levels” of growth at Tier 2 settlements, “constrained” opportunities at Tier 3a settlements and at Tier 3b, 4a and 4b settlements, “very limited development” to meet specific...needs such as boosting “social sustainability”.
- 2.6.4 Clearly the work on the generation of the preferred hybrid strategy determined that new settlements should form part of the final strategy. Whilst these new settlements are located in close proximity to existing Tier 1 and Tier 2 settlements, they are not in themselves existing settlements which currently form part of the settlement hierarchy, but will become part of the future settlement hierarchy once established and will be identified in future reviews of the SDLP.
- 2.6.5 It should be noted that certain settlements, for example, the Tier 1 settlements of Stroud and Dursley and the Tier 2 settlement of Wotton-under-Edge, are identified within the settlement hierarchy as appropriate locations for further development, because of their current role and function. However, because of environmental (particularly landscape) constraints, the SDLP does not allocate urban extensions at these settlements and consequently, in absolute housing numbers, they are unlikely to contribute levels of future growth which their position in the settlement hierarchy would warrant. This does not mean that the development strategy is inconsistent with the settlement hierarchy, because if a large suitable site were to be identified at these settlements through the development management process, and there were to be a development need established, the SDLP would provide a consistent spatial framework for the determination of any planning application.
- 2.6.6 A final point to note is that the development strategy also supports the regeneration of the canal corridor through the Stroud valleys and at Berkeley/Sharpness. This fine-tuning of the strategy reflects local characteristics and specific regeneration projects that do not directly arise from the settlement hierarchy. However, they are not inconsistent with settlement hierarchy. These elements of the strategy were identified in the adopted Local Plan and have been carried forward into the SDLP.

7. Has it been clearly demonstrated how the SA, HRA, infrastructure, viability and other relevant evidence have influenced the location of development and the overall strategy during plan-making?

- 2.7.1 Topic Paper – The Development Strategy (EB4) and Topic Paper – Assessment & selection of sites (EB9) set out how a variety of evidence and assessment tools, including SA, HRA and SALA site evidence have informed the generation

of spatial options and selection of the preferred development strategy and the location of specific development sites.

- 2.7.2 Evidence on infrastructure, in particular, the Infrastructure Delivery Plan (IDP) (EB69), demonstrated that there were no “showstoppers” in terms of locations of development where a current or future deficit could not be mitigated through appropriate development. The IDP was used to inform the specific policy requirements for each of the strategic site allocations.
- 2.7.3 Evidence on viability, in particular the Viability Assessment Refresh (EB111) has confirmed that greenfield sites across the District are generally viable. Whilst brownfield sites remain challenging, the Council has allocated those sites where specific site evidence demonstrates they are deliverable. The strategic site allocations are being actively promoted by landowners /developers and deliverability will be confirmed through site specific statements of common ground.

8. Does the spatial strategy make effective use of previously developed land and is this based on a robust and up-to-date evidence base?

- 2.8.1 The Council has a robust and up-to-date evidence base for the assessment of previously developed land. The Council maintains a Brownfield Land Register which is updated on an annual basis. The SALA process (2017-2020) involved the assessment of previously developed land opportunities at Tier 1-3 towns and villages. Current commitments on previously developed land form part of the SDLP housing supply and the land supply includes an allowance for small windfall sites, based upon historic completion rates.
- 2.8.2 The development strategy is clear at paragraph 2.3.10 that “the regeneration of previously used sites and further infill development to maximise the use of brownfield land will be supported at...settlements, within settlement development limits” (CD1, page 23).
- 2.8.3 The development strategy is underpinned by a settlement hierarchy which seeks to locate development at the largest settlements where the majority of previously developed land opportunities exist, and within settlement development limits, which have been designed to follow the existing urban fabric of settlements, thereby maximising opportunities for the redevelopment of existing land. Core Policy CP3 states that “The use of previously developed land and buildings within settlements will be given substantial weight.” (CD1, page 55).
- 2.8.4 The SALA methodology prioritised the identification of existing deliverable and developable sites which are mainly on previously developed land within existing Tier 1-3 settlements. As a result, a number of previously developed sites are allocated for development within the SDLP. The Council is also proactively involved in bringing forward a number of these sites, often using public subsidy to de-risk sites, and is developing other brownfield sites through its ambitious New Build housing programme.
- 2.8.5 However, it became clear early on in the plan making process, that the SALA had not identified sufficient deliverable and developable sites for the Council to

be able to avoid looking at broad locations for growth outside of existing settlements, which are mainly located on greenfield land.

2.8.6 In addition, the current operation of CIL (which exempts brownfield sites from payment within a defined Stroud Valleys river/canal corridor) and more recent viability work (EB111) demonstrate that previously developed land has significant viability challenges across the District. Consequently, whilst the Council has sought to maximise the development of previously developed land through the development strategy and through the allocation of specific deliverable and developable sites, the Council can demonstrate a more than 6-year deliverable housing supply without relying on brownfield sites in the event that development does not come forward as anticipated (Topic Paper- Housing needs and supply EB8 paragraph 2.16).

9. Do Core Strategy Policies CP2 and CP4 take a sufficiently strategic approach to clearly define the development strategy for the District as a whole? Should consideration be given to a new policy encompassing the elements of the District wide spatial strategy that are set out in chapter 2 of the Plan, such as the key development strategy headlines?

2.9.1 The Council considers that chapters 2.3-2.8 provide a high level but sufficiently detailed introduction to the development strategy which is then defined and delivered through the six Core Policies set out in section 2.9. It is not clear immediately what the benefits would be of moving the development strategy headlines on page 23 into a new policy, but the Council is happy to consider the merits of doing so.

10. Paragraph 23 of the Framework states that broad locations for development should be located on a key diagram. Can the Council clarify whether Map 3 (page 24) in the Plan is the key diagram?

2.10.1 Map 3 The development strategy on page 24 of the SDLP (CD1) sets out the broad locations for development required by the NPPF and therefore does constitute the key diagram.

11. Will the spatial strategy promote the vitality of town centres in the District and support a prosperous rural economy, as required by national policy?

2.11.1 The SDLP contains a strategic objective SO3: Town centre and rural hinterland for “Improving the safety, vitality and viability of our town centres, which link to and support the needs of their rural hinterlands” (CD1, page 20). In the section describing how the development strategy reflects the Local Plan’s strategic objectives, paragraph 2.3.36 states: “By concentrating development within or adjacent to the District’s larger settlements, the strategy should facilitate opportunities for the provision of new and improved services and facilities and will generate additional custom to sustain those already existing. Some smaller scale development at lower tier settlements will help to support our more local

centres. A focus on brownfield regeneration and tourism- and leisure-led mixed-use development on sites lying close to the canal corridor and Stonehouse and Stroud town centres should bring about public realm enhancements, improved linkages and a boost to town centre trade” (CD1, paragraph 2.3.36).

2.11.2 The development strategy also seeks to support the rural economy by focussing employment development at designated key employment areas (Core Policy CP1), many of which are located at smaller towns and villages through the District, and through specific policies which support the extension of existing employment sites in the countryside (Delivery Policy EI4), farm and forestry diversification (Delivery Policy EI5) and the provision of new tourism opportunities (Delivery Policy EI10). It is noted in the SDLP (CD1) that “there is an active rural market for a mix of office and small workshop space” (paragraph 2.6.4) and the SDLP seeks to support this.

12. Is the use of the term ‘cumulative total’ in Core Policy CP2 clear? Or does it imply total dwellings for each settlement? Is this consistent with the site allocation policies which uses terms such as ‘approximately’ when defining dwelling numbers?

2.12.1 The table in Core Policy CP2 which includes the phrase “cumulative total” appears after the phrase “Local development sites are allocated at the following settlements” and before the next phrase which states “In addition to allocated sites, development will take place in accordance with the Settlement Hierarchy set out in this Plan.” Consequently, the Council believes it is clear that the “cumulative total” in the table refers to local development sites that have been allocated and does not relate to other development at these settlements which is clearly “in addition” to the numbers set out in the table.

2.12.2 The Council agrees that the total numbers of housing and employment for sites set out in the tables in Core Policy CP2 are precise figures whereas many of the site policies are defined more flexibly as, for example, “approximately”. This is not considered to be a significant issue as these tables constitute high level summaries of more detailed site policies contained elsewhere in the SDLP and the figures are not of themselves contradictory.

13. Core Policy CP4 states that all development proposals shall accord with the mini visions, have regard to the guiding principles and shall be informed by other relevant documents. It also identifies that development will be expected to integrate into the neighbourhood, place shape and protect or enhance a sense of place and create safe streets, homes and workplaces.

a. Is the approach in the policy justified and effective? Is its intention clear and is it consistent with national policy?

2.13.1 The wording of Core Policy CP4 requiring that development proposals shall accord with the mini visions, have regard to the guiding principles and shall be informed by other relevant documents reflects the approach set out in the

adopted Local Plan for Core Policy CP4, which was supported by the Local Plan Inspector in 2015 (EB115, para. 78). The mini-visions “unpack” the District’s vision for each parish cluster area and the guiding principles demonstrate how the mini-visions are to be achieved, unpacking the development strategy for each parish cluster area. They are therefore justified by the need to implement the vision and strategy locally and will be effective in delivery. References to design statements were adopted as SPD reflects the importance of defining local distinctiveness in the context of evaluating good design (NPPF, para. 190).

- b. Does the policy set out clear development requirements, or are these more clearly defined in other Plan policies? If so, why is there duplication?

2.13.2 The approach of the SDLP is for matters of broad policy and principle to be set out within Core Policies and for more specific policy to be provided through the various delivery policies set out in the SDLP. In this case, place-making and good design are seen as a key principles of the planning system and deserve to be identified within the development strategy core policies. Detailed matters are covered elsewhere, including, for example, Delivery Policy ES12.

- c. Reference is made in the policy’s supporting text, at paragraph 9.22, to the National Design Guide. How does the policy relate to the updated 2021 version of this national guidance?

2.13.3 The 2021 National Design Guide was amended to align with National Model Design Code and Guidance Notes for Design Codes, published separately. As the supporting text at para. 2.9.22 recommends that proposals should take account of Government guidance on design, it would be appropriate to update the reference to reflect the latest updated guidance.

- 14. Overall, will the spatial strategy meet the overarching strategic objectives and achieve the Council’s vision?

2.14.1 The SDLP (CD1) specifically identifies how the development strategy will address the Plan’s strategic objectives in the section set out on pages 28 to 29.

2.14.2 The strategic objectives were themselves generated and refined through the SA process, specifically to address the overall vision for Stroud District. The vision was determined through the SA scoping process, an analysis of evidence gathering and through local consultation. Consequently, the development strategy, in seeking to deliver the strategic objectives of the SDLP, thereby seeks to achieve the SDLP vision.

Settlement hierarchy

The Council has produced a Settlement Role and Function Study (2014) (EB71) and an Update (2018) (EB72) to inform the settlement hierarchy and the development strategy. The Plan sets out the settlement hierarchy in Core Policy CP3.

15. Core Policy CP3 states that proposals for new development should be located in accordance with the hierarchy. The Council indicates this will assist in delivering sustainable development, by concentrating growth in those settlements that already have a range of services and facilities.
 - a. Has the settlement hierarchy been derived using a robust and justified process and is it supported by credible evidence?
 - b. It has been suggested by representors that some settlements (including Minchinhampton, Painswick, Chalford and Kingswood) should be re-categorised within the hierarchy. Does the settlement hierarchy accurately reflect the role and function of different settlements within the District and are the settlement categorisations justified by robust and up-to-date evidence?

2.15.1 The Council believes that the settlement hierarchy, as set out in CP3, does accurately reflect the role and function of the different settlements within Stroud District.

2.15.2 Justification for the categorisation of each of the district's settlements within the CP3 settlement hierarchy is evidenced through the Stroud District Settlement Role and Function Study Update 2018 (SRFS) (EB72) and the 2014 Stroud District Settlement Role and Function Study (SRFS) (EB71). The 2018 SRFSU (EB72) serves to update and supplement the evidence contained in the earlier 2014 SRFS, which was key evidence in the formulation of the current settlement hierarchy (as set out in Core Policy CP3 of the 2015 adopted Local Plan (EB114)). Whilst some aspects of the data and findings in the 2014 SRFS are superseded by the 2018 update, the 2014 study remains relevant evidence. Together, the two studies have informed the re-drafting of CP3, including the re-categorisation of some settlements.

2.15.3 As regards the evidence behind the current settlement hierarchy (as set out in Core Policy CP3 of the 2015 adopted Local Plan), the Inspector found that:

"...the proposed settlement hierarchy is appropriate, effective and justified with up-to- date evidence, and reflects the existing role each settlement plays, as well as identifying the more sustainable and accessible settlements with the widest range of services where strategic growth should be concentrated." (2015 inspectors report (EB115) paragraph 71).

2.15.4 He concluded that: *"...Policy CP3 establishes an appropriate, effective, sustainable and soundly based settlement hierarchy which reflects the existing and future role of these settlements."* (EB115, paragraph 77).

- 2.15.5 Throughout the Local Plan Review, the Council has taken the approach of using the existing settlement hierarchy as a sound starting point, then updating and building upon the existing evidence base. The Council believes this demonstrates robustness and consistency in terms of evidence-gathering methodology; and continuity in terms of broad strategic approach.
- 2.15.6 Although the idea of defined settlements has been long established within the District (the use of settlement boundaries as a planning policy tool was first introduced into Stroud District in the 1992 draft Local Plan) the policy framework around them has been continually evolving with each Plan, becoming increasingly sophisticated – as the introduction to the 2018 SRFU explains (EB72 paragraphs 1.4 – 1.8).
- 2.15.7 The 2015 adopted Local Plan (like the 2021 Submission Draft Plan) focused on identifying those settlements that offer the best opportunities for sustainable development. The current CP3 hierarchy was introduced, consisting of five distinct tiers, with the largest towns and villages (containing the best range of services and facilities) in the top tiers, and the smallest (containing minimal facilities) in the bottom tiers. This was informed by:
- The 2010 Stroud District Rural Settlements Classification Paper (2010), which audited the services and facilities then available within each defined settlement and set out simple criteria to determine where each settlement sits according to the settlement hierarchy that went on to be adopted in the 2015 Plan.
 - The 2014 Stroud District Settlement Role and Function Study (EB71), which sought to build up a more rounded picture of how each of the District's settlements function and relate to each other. It compared each of the (then proposed) Tier 1 – 3 settlements against a range of criteria, including size, access to services and facilities (both within the settlement and elsewhere), level of retail provision and employment role.
- 2.15.8 For the current Local Plan Review, the 2018 SRFSU (EB72) updated the data contained in the 2014 SRFS (where more up-to-date data was available), with a view to refining the current settlement hierarchy to take account of any changed circumstances or new information and to address some of the comments and criticisms that emerged about the current hierarchy through the Issues and Options consultation stage (2017) (EB72, para. 1.13).
- 2.15.9 Importantly, the 2018 SRFSU also broadened the analysis and scope of the original study (this time including analysis of all settlements, not just Tiers 1-3), allowing more nuanced comparison between more than 50 settlements.
- 2.15.10 All of the District's defined settlements have now been subject to the same objective accessibility analysis, using consistent data, criteria and a common methodology, which allows a fuller picture of each settlement's functionality and accessibility relative to all the other settlements in Stroud District, across the whole spectrum – from the largest and most well-connected to the smallest and most remote. (The 2014 SRFS and the 2010 Rural Settlements Classification Paper had not analysed accessibility data for Tier 4 or 5 settlements).

- 2.15.11 The data gathering and analysis for the 2018 SRFSU was carried out during spring and summer 2018, alongside preparation of the Local Plan Emerging Strategy (EB105), which was published for consultation in November 2018 and included a first draft revised settlement hierarchy. The assembly of the data into a published form (i.e. the 2018 SRFSU) was completed in early 2019, subsequent to the Emerging Strategy consultation.
- 2.15.12 The 2014 SRFS and the 2018 SRFSU are desk-based studies, which refer to and analyse existing evidence and readily-available data. The study undertook statistical analysis within four main topic areas, with the aim of producing a 'profile' of the settlements, identifying their main roles, how they function now and how this might change in the future:
- Population and housing
 - Employment role
 - Accessibility: travel to work and access to services and facilities
 - Retail and community services / facilities
- 2.15.13 Chapter 1 of the 2018 SRFS (EB72, pages 6-9) explains the scope of the study, the methodology, data sources and geographies used. It explains that EB71 and EB72 should be read together: the 2018 update supersedes some of the data and analysis in the original study. All source material is identified throughout the Study in footnotes or table headers.
- Census data from the 2001 and 2011 national census forms the basis of some baseline estimation, such as population size, demographic characteristics, economic activity, and residents' employment characteristics and travel-to-work patterns. This is the most up-to-date evidence available, as data from the 2021 census is only just becoming available in limited releases (as at spring 2023).
 - ONS 2016-based sub-national population projections, applied to 2011 census data, were used to illustrate projected demographic trends for Stroud District. (n.b. cross checking with recently released 2021 census data suggests the projections for 2021 were broadly on target and the study has correctly identified the District's population trends).
 - The Council's annual Housing Land Availability (HLA) reports were used to update settlements' estimated size and rates of growth, based on housing supply, planning permissions and completions, up to 31st March 2018.
 - 2018 Local Insight Profiles produced by Inform Gloucestershire (the County Council's in-house statistical unit) were used to assess housing affordability (by parish). The 2018 profiles used data from 2016 – 2018 (all sources are identified on EB72 page 21, following Table 3). Whilst more up-to-date data may now be available, the Council considers this evidence is adequate and proportionate to identify very broad affordability trends across the District.

- The audit of services and facilities available at each settlement (EB72, Table 4 and Table 5) is up-to-date as at 2018. The Council acknowledges that some settlements will have experienced some losses, gains or changes since then.
 - Ease of access to key services and facilities (within settlements and elsewhere) was measured using postcode-based travel time data from Inform Gloucestershire's Accessibility Matrix 2016 (EB72 Table 6). This data is produced annually, using transport modelling software (the most recent Accessibility Matrix was published in 2022, based on public transport service provision during autumn 2021) and the Council acknowledges that some settlements will have experienced changes to public transport services or frequency since 2016.
- 2.15.14 Representations on the settlement hierarchy commonly point to loss of particular services and facilities or changes to bus timetabling, to support arguments that specific settlements have been wrongly classified. The Council acknowledges that there will of course be changes over time, and indeed there have been since 2018.
- 2.15.15 Some changes (for example, closure of high street banking facilities) are reflective of national trends and individual losses may well be seen in multiple settlements, across the District. These individual losses may not always be sufficient to alter the fundamental role and function of a settlement, relative to others, such that it would be bumped into a different tier of the hierarchy. The Council considers the hierarchy tiers have sufficient 'band width' between them to absorb minor fluctuations and anomalies. Moreover, the baseline picture painted by the Settlement Role and Function Study also enables impacts (such as lost/gained facilities or post-covid changes to work patterns) to be monitored, going forward.
- 2.15.16 In short, the Council maintains that the evidence base is adequate, proportionate and relevant, being sufficient to identify in quite broad terms how each settlement's role and function compares to others in the District, to help identify opportunities and needs and to inform the development of policies and proposals that will shape each settlement's future (as explained in EB72, para. 1.11).
- 2.15.17 The idea of relativity is important to the hierarchy. For example, whilst it is reasonable to take issue with whether a particular settlement feels like it has "good" accessibility, when residents consider the bus timetable and road infrastructure is inadequate, a rating of "good" will be relative to other settlements elsewhere in the District which may be more remote and have little or no potential for improved connectivity.
- 2.15.18 Classifying each settlement within a hierarchy is a key part of the Council's policy approach. Individual settlement classifications involve a degree of judgement, balancing settlements' strengths, weaknesses and sometime anomalous characteristics. But the Council considers the hierarchy has been derived using a robust and justified process and is it supported by credible evidence.
- 2.15.19 In examining the current 2015 Local Plan, the inspector concluded:

“The identification of particular settlements within each level of the hierarchy is a matter of judgement, but SDC has adopted a consistent and logical approach, which is justified with up-to-date evidence, based on the existing role of the settlements, the level of strategic and other services and facilities, accessibility and overall sustainability.” (library ref, paragraph 76)

“The detailed categorisation of settlements involves some judgements. Five tiers of settlements could be seen as too many, but it helps to distinguish the roles the various settlements play in the hierarchy and identify those which are more appropriate for strategic growth.” (library ref, paragraph 72)

- 2.15.20 Within the top three tiers of the hierarchy (Tiers 1 – 3) there is very little change in how settlements have been classified since 2015. The 2021 Submission Draft Plan proposes a ‘demotion’ from Tier 2 to Tier 3 for Frampton-on-Severn and a ‘promotion’ from Tier 3 to Tier 2 for Painswick. The small village of Miserden has also been newly identified as a settlement and has been categorised within Tier 3.
- 2.15.21 However, the revised hierarchy does sub-divide Tier 3 settlements into 3a “Accessible Settlements with Local Facilities” and 3b “Settlements with Local Facilities” – whereas they are all known as “Accessible Settlements with Limited Facilities” in the current Plan. These 23 settlements comprise almost half of all Stroud’s settlements and there is considerable variation between them in terms of scale, range of services and facilities and accessibility.
- 2.15.22 The majority of comments from representors (both objections and comments of support) have concerned the attribution of 3a or 3b status to particular settlements within this tier. But evidence shows that the settlements grouped within Tier 3a have more in common with each other than they do with the Tier 3b sub-group; and vice versa. The council believes this sub-categorisation and replacing the word “limited” with “local” are justified refinements, which better reflect the true functionality of Tier 3 settlements and their diversity.
- 2.15.23 Similarly, Tiers 4 and 5 of the current hierarchy have been re-named Tier 4a “Accessible Settlements with Basic Facilities” (currently “Accessible Settlements with Minimal Facilities”) and 4b “Settlements with Basic Facilities” (currently “Unclassified”) to more accurately reflect the role and function of those settlements. Eight settlements have been ‘demoted’ from the 4a (4) group to 4b (5), to reflect the evidence about their functionality and accessibility, as summarised in the 2018 SRFSU (to reiterate, the 2014 SRFS and the 2010 Rural Settlements Classification Paper had not analysed accessibility data for Tier 4 or 5 settlements).
- 2.15.24 The Council also considers the proposed re-naming of Tier 1 settlements as “Main Settlements” (rather than “Accessible Local Service Centres” in the current Plan) more accurately reflects the role and function of those settlements, relative to the Tier 2 “Local Service Centres”.
- 2.15.25 The categorisation of a small number of settlements (including Minchinhampton, Painswick, Chalford and Kingswood) has proved contentious to some representors. However, the Council believes that the categorisation of these and others (including the re-categorisation of those settlements mentioned above)

does accurately reflect the role and function of the District's diverse settlements, relative to each other, and they are justified by robust and up-to-date evidence.

2.15.26 Representations about these settlements included the following arguments:

- Levels of services and facilities in Chalford are overstated in the 2018 SRFSU and/or outdated since 2018 (reference to loss of a primary school, post office, frequency of public transport)
- Chalford Hill and Chalford Vale should be viewed as functionally different settlements for the purposes of planning and housing allocation; both should be designated as Tier 3b
- Kingswood's classification relies too heavily on its proximity to Wotton Under Edge (Tier 2); there is poor actual connectivity and transport links between the two, despite proximity
- Retail and connectivity are limited in Minchinhampton and have declined since the 2014 SRFS and the 2018 SRFSU
- Minchinhampton's range of services, facilities and retail outlets does not compare with other Tier 2 settlements, particularly Nailsworth.
- Tier 2 classification exposes both Painswick and Minchinhampton to disproportionate and unsustainable levels of growth
- Tier 2 status does not reflect (and will not serve to enhance or protect) Painswick's retail role and 'district centre' designation.

2.15.27 Chalford and Kingswood are Tier 3 settlements in the current settlement hierarchy (2015 adopted Local Plan). They are both sub-categorised as Tier 3a "Accessible Settlements with Local Facilities" in the revised hierarchy, based on balancing a variety of objectively measured factors and characteristics. Evidence contained within the 2014 SRFS and the 2018 SRFSU shows Kingswood sits comfortably in the mid-range of the Tier 3a sub-group, in terms of scale and most aspects of functionality. But in terms of accessibility and employment role, Kingswood is significantly better performing than all Tier 3b settlements, and a relatively high performer even within the 3a group. Relative to many other settlements in the District, the village genuinely benefits from proximity to strategic services located nearby at Wotton and KLB secondary school. The geographic proximity offers opportunities to enhance connectivity (e.g. through improved walking and cycling routes or bus services, which are key issues and guiding principles for the Wotton, Cluster, as identified at CD1 paragraphs 3.7.4 and 3.7.5) – opportunities that are not available to more remote settlements. Classification as an "Accessible Settlement with Local Facilities" is therefore considered justified.

2.15.28 The Council concedes that it is possible to make a case to justify the bisection of Chalford into two separately defined settlements. However, the Council maintains that evidence drawn from the 2018 SRFSU (EB72) indicates that neither Chalford Hill nor Chalford Vale would be 'demoted' from Tier 3a to Tier 3b as an inevitable consequence of such a split: both areas independently meet criteria commensurate with the role and function of Tier 3a Accessible Settlements with Local Facilities.

2.15.29 Minchinhampton is a Tier 2 settlement in the current settlement hierarchy (2015 adopted Local Plan) and Painswick is a Tier 3 settlement. Both are categorised

as Tier 2 “Local Service Centres” in the revised hierarchy. There are just five Tier 2 settlements and, again, there is considerable range within this category. Minchinhampton, Painswick and Berkeley have broadly more limited functionality than the larger settlements of Nailsworth and Wotton-under-Edge, which is reflected in how their retail and town centre roles are differentiated through the Plan’s Retail Hierarchy. Nevertheless, all five of these settlements provide a higher level of services and facilities than Tier 3a settlements, performing at least a basic strategic function, combined with either a strong or very strong local function. These settlements fit a clear gap between the District’s Tier 1 Main Settlements and Tier 3a Accessible Settlements with Local Facilities.

2.15.30 A ‘health check’ for each of these settlements has been produced (EB223), consisting of a concise summary of the existing evidence contained within the Settlement Role and Function Study and Update, in order to demonstrate that the settlement hierarchy accurately reflects their individual role and function and that their CP3 categorisation is justified.

16. New settlements are proposed within the Plan, at Sharpness and Wisloe, but are not included in the settlement hierarchy. The approach in the Plan is to define these as settlements through a future Local Plan Review. Yet reference is made to ‘anticipated’ local centres within these settlements within Core Policy CP12.

a. Why are these proposed new settlements not in the hierarchy?

2.16.1 Paragraph 2.9.19 (supporting text to Core Policy CP3) explains:

“Hunts Grove and 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.”

2.16.2 Chapter 2.4 Our Towns and Villages (which summarises the Plan’s development strategy) reiterates this approach to the planned new settlements and, further, sets out the Plan’s expectation that *“Hunts Grove and the new settlement at Sharpness will both include sufficient local facilities to achieve Local Service Centre status (Tier 2) in the future; while Wisloe will function as a new Accessible Settlement with Local Facilities once complete (Tier 3a)”* (CD1, para. 2.4.7).

2.16.3 In Chapter 3 Making Places, the settlement summaries for Hardwicke & Hunts Grove (page 142), Sharpness new settlement (page 175) and Wisloe new settlement (page 182) also set out the Plan’s expectation for future settlement role and function; and their individual site allocation policies set out specific detailed criteria and development requirements, emphasising that the whole must be developed in an *“integrated and coordinated manner”* (Strategic Site Allocation Policies PS36 and PS37).

- 2.16.4 The Plan is therefore clear about what is expected in terms of the future delivery of facilities, services and employment opportunities on these red-lined sites. However, none of these things yet exist. These places do not yet (fully) exist as settlements, so the Council considers it inappropriate to include them within a hierarchy of the District's settlements. Defining these red-lined sites as "settlements", and then allowing the application of CP3 and other local plan policies that link to the settlement hierarchy (such as CP8, DHC1, DHC2, HC4, DHC3, EI10 and EI11, which include hierarchy- and/or SDL-based policy criteria) would be placing the cart before the horse. This would risk individual, piecemeal housing, employment, tourism or leisure development occurring ahead of the supporting population mass, infrastructure and facilities that the Plan intends to steer the location and distribution of sustainable development.
- 2.16.5 The Council considers the Plan's approach to defining new settlements, as set out at paragraphs 2.4.6 and 2.9.19, to be valid and pragmatic.
- 2.16.6 The Council acknowledges that there appears to be some contradiction with the way in which "anticipated" local centres are treated in Core Policy CP12 (Town centres and retailing): here the Plan's six "anticipated" local centres are listed within the retail hierarchy, alongside established local centres. However, the settlement hierarchy in CP3 and the retail hierarchy in CP12 (and EI9) are different tools. They are independent designations.
- 2.16.7 As 2.9.19 states, development must be "*...sufficiently advanced to establish their anticipated role and function*", in order for the development areas at Sharpness and Wisloe to attain their anticipated settlement status (Tier 2 and 3a, respectively). Local centres of an appropriate scale and level of functionality are a prerequisite: they need to be up and running, to the extent that a future audit of services and facilities within the area would be able to 'score' the development on a par with the District's Tier 2 and Tier 3a settlements.
- 2.16.8 By definition, therefore, some town centre and retailing development will occur on these allocated sites, before they become defined settlements (i.e. before CP3 can be applied to them). Identifying the six "anticipated" Local Centres at new settlement and urban extension sites through Core Policy CP12 enables the Plan to steer development – through the application of CP12 criterion C, particularly – alongside any specific requirements set out in individual site allocation policies (including PS36 criterion 8 and PS37 criterion 7).
- b. If housing and employment growth will be centred at these new settlements, how will the distribution of growth in the Plan reflect the settlement hierarchy if they are not included within it?
- 2.16.9 The planned new settlements at Sharpness, Wisloe and Hunts Grove are not included within the CP3 hierarchy of existing settlements. However, the Council does not believe that this is incompatible with the Plan's strategy to concentrate housing and employment growth at these locations. Indeed, taken as a whole, the Plan's development strategy sets out a dynamic future for the District's settlements, with a clear pathway for how the settlement hierarchy is envisioned to evolve in the future to embrace these new sustainable communities.

- 2.16.10 Core Policy CP3 is subtitled “A hierarchy for growth and development across the District’s settlements” (CD1, page 54). Core Policy CP3 is indeed a key component of the Plan’s overall development strategy, helping to manage the distribution of future growth, alongside Core Policy CP2 Strategic Growth and Development Locations.
- 2.16.11 Supporting text for Core Policy CP2 (CD1, page 52) is clear that:
- “2.9.9 The strategy for delivering the required [growth] 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.*
- 2.9.10 The strategic sites are located at the principal settlements within the District, at new settlements and within the key employment property market areas: south of Gloucester, Rail/M5/A38 Corridor, Stroud Valleys and Berkeley/Sharpness.*
- 2.9.11 Smaller scale development is expected to come forward at those settlements identified in the Plan’s settlement hierarchy, as set out in Core Policy CP3.”*
- 2.16.12 The Council considers that the distribution of growth in the Plan does reflect the settlement hierarchy of existing settlements, as set out in CP3. Moreover, the Plan sets out a clear vision for the future of the three planned new settlements (at Sharpness, Wisloe and Hunts Grove) and how they will fit into a future settlement hierarchy. This is described in supporting text for CP3 (paragraphs 2.9.18-2.9.19), in Chapter 2.4 Our Towns and Villages (paragraphs 2.4.5 – 2.4.9), in Chapter 3 Making Places (settlement summaries on pages 147, 175 and 182; and site allocation policies PS30, PS36 and PS37).
- 2.16.13 However, supporting text for Core Policy CP3 (CD1, page 54) is clear that, until such time as development on these new settlement sites is sufficiently advanced to establish their anticipated role and function, *“...the scale and nature of their growth and development is determined through their respective site allocation policies and subsequent planning applications”* – not through the application of Core Policy CP3.
- c. How will development proposals at these locations be dealt with where several policies in the Plan refer to the settlement hierarchy in their application?
- 2.16.14 This matter is touched upon in response to Questions 16(a) and (b), above. Supporting text for Core Policy CP3 (CD1, page 54) is clear that, until such time as these sites are defined as settlements in their own right, with their own settlement development limits, *“...the scale and nature of their growth and development is determined through their respective site allocation policies and subsequent planning applications”* – not through the application of Core Policy CP3.
- 2.16.15 The site allocation policies set out specific detailed criteria and development requirements, emphasising that the whole must be developed in an *“integrated*

and coordinated manner” (Strategic Site Allocation Policies PS36 and PS37) and demonstrated via tools including a community engagement and stewardship strategy, design codes, a spatial masterplan and implementation plan. In addition to the site allocation policies, other Core Policies and Development Management Policies will apply, to assess things like placemaking and design, sustainable construction, heritage impacts, surface water management, open space provision and so on.

- 2.16.16 Some of the Plan’s policies do link directly to the settlement hierarchy and include hierarchy- and/or SDL-based policy criteria (such as CP8, DHC1, DHC2, HC4, DHC3, EI10 and EI11) to manage the location, scale and nature of housing, employment, tourism or leisure development.
- 2.16.17 The Council recognises that it may be expedient to modify the supporting text for Strategic Site Allocation Policies relating to the planned new settlements (PS30 Hunts Grove extension, PS36 Sharpness new settlement and PS37 Wisloe new settlement). An additional sentence could usefully clarify that the anticipated role and function of the planned new settlement (as a Tier 2 Local Service Centre / Tier 3a Accessible Settlement with Local Facilities) should be reflected in the application of the site allocation policy and any other Plan policies that rely upon hierarchy-based criteria, to ensure the new community, land uses and infrastructure will be delivered in an integrated and coordinated manner.
17. Core Policy CP3 lists Hunts Grove as being a tier 2 local service centre (anticipated). Yet paragraph 2.9.19 states that Hunts Grove is not included within the settlement hierarchy. Can the Council clarify this and also explain why Hunts Grove is ‘anticipated’ as a tier 2 settlement?
- 2.17.1 Paragraph 2.9.19 (supporting text to Core Policy CO3) is indeed clear that none of the planned new settlements (Hunts Grove, Sharpness and Wisloe) is included within the settlement hierarchy at present. This is reiterated and expanded upon in Chapter 2.4 (CD1, paragraphs 2.4.5. – 2.4.9), which explains how the planned new settlements fit into the development strategy.
- 2.17.2 The Council acknowledges that there is an apparent contradiction, in that Hunts Grove is subsequently listed as an “anticipated” Tier 2 Local Service Centre in the CP3 policy wording; and that this apparent inconsistency could be resolved by modifying the policy wording to remove reference to “Hunts Grove (anticipated)”.
- 2.17.3 However, there is an historic reason for this wording (a legacy of the current 2015 Adopted Local Plan) and a logic behind differentiating Hunts Grove from the other planned new settlements in the 2021 submission draft plan (CD1) (PS36 Sharpness and PS37 Wisloe).
- 2.17.4 The advanced and committed nature of the Hunts Grove development differs from that of site allocations PS36 and PS37. Approximately 95 hectares of land at Colethrop Farm (Hunts Grove) was first allocated as a major strategic mixed use development through the 2005 Stroud District Local Plan. By the time of that local plan review (2009-2015), the Hunts Grove site was committed development

and the 2014 SRFS (EB71) records 280 dwellings already on site (Table 5, page 14, reflecting data from the 2014 Stroud District Housing Land Availability Study). The masterplan showed that the development (if built out in broad accordance with the 2008 approved Outline scheme and subsequent Reserved Matters permissions) would deliver a new community with a range of services and facilities comparable with the district's existing Tier 2 settlements.

- 2.17.5 Progress at Hunts Grove was sufficiently advanced to ensure reasonable confidence in the future delivery of a fully functional development, as envisaged. Hence the 2015 Adopted Local Plan includes the assertion that *"Hunts Grove, a planned urban extension to Gloucester, will include sufficient local facilities to achieve Local Service Centre status"* (2015 paragraph 2.78) as supporting text to Core Policy CP3, and Hunts Grove is identified as an "anticipated" Tier 2 Local Service Centre in the adopted hierarchy.
- 2.17.6 Additionally, the 2015 Adopted Local Plan identified a further piece of land as an extension to the Hunts Grove development "to provide certainty about the ultimate extent of development in this area...[and] support and extend the community infrastructure for this location" (EB114, para. 3.52). This is current site allocation SA4 Hunts Grove Extension, which is carried forward into the 2021 submission draft plan (CD1) as Strategic Site Allocation PS30. The supporting text for PS30 (CD1, para. 3.4.7 – 3.4.11) mirrors that of the existing SA4 allocation and explains the history of the wider Hunts Grove site, as outlined above.
- 2.17.7 In examining the 2015 adopted Local Plan, the Inspector understood that *"Hunts Grove is a committed large-scale development lying to the south of Gloucester, and the SDLP makes effective use of this existing allocation and its associated planned infrastructure and facilities, and consolidates the development area."* He concluded that the CP3 settlement hierarchy *"...recognises the future role that some expanding settlements will play, such as Hunts Grove and Stonehouse, where major strategic developments are proposed"* (EB115, paragraphs 72 and 75).
- 2.17.8 The Council maintains that the plan's approach to defining new settlements, as set out at paragraphs 2.4.6 and 2.9.19, is valid and pragmatic. The Council remains confident in the ultimate functionality of the Hunts Grove development, once complete. However, the Council considers that, at the current stage of this Local Plan Review, the development is still not sufficiently advanced (with a fully operational range of services and facilities) to establish its ultimate role and function as a new settlement, and that this remains "anticipated". It is expected that Hunts Grove will be defined as a settlement in its own right at the next Local Plan Review, and CP3 will then apply.

18. Have implications of the larger strategic allocations on the existing settlements and their place within the settlement hierarchy been robustly assessed?

- 2.18.1 The settlement hierarchy set out in CP3 is based on assessment of each settlement's current role and function, with the intention of directing growth

towards the most sustainable locations and places that offer relatively good accessibility to key services and facilities.

- 2.18.2 The site selection process has involved robust assessment of potential sites' accessibility and the case for growth at each settlement, as evidenced through the Council's Topic Paper – Assessment and selection of sites (EB9), the 2018 Settlement Role and Function Study Update (EB72), the SALA Transport Accessibility Assessment (EB112, a-c) and Sustainability Appraisal.
- 2.18.3 The Sustainability Appraisal Report for the Stroud District Local Plan Review - Pre-submission Draft Local Plan (May 2021) considers the potential effects of development on individual settlements in the District (CD3, page 134).
- 2.18.4 The development of large strategic sites (urban extensions and new settlements) will have an impact on the accessibility of existing settlements – both the settlements to which the urban extensions are attached, and others in the surrounding area: each of the larger strategic sites will deliver an amount of new services and facilities and some of them will also deliver new employment opportunities and transport infrastructure. As development occurs, these accessibility impacts can be assessed - potentially through future updates to the SRFS, accessibility studies, or other evidence required for future local plan reviews. If there are any significant accessibility impacts (such that it would result in a step-change in an existing settlement's role and function), this can be reflected in future revisions to the settlement hierarchy.
- 2.18.5 However, the Council does not anticipate the development of the Plan's large strategic urban extension sites to alter the fundamental role and function of the settlements to which they are attached. The urban extensions (site allocations PS19a, PS20, PS24, PS25) are conceived as extensions to existing high tier, high-functioning settlements (PS30 is envisaged as an urban extension to the anticipated new Tier 2 settlement of Hunts Grove and G1 an extension to Tier 3a Hardwicke but adjacent to Tier 2 Hunts Grove). The development requirements set out within their individual site allocation policies (and criteria in other specialist Core and Delivery Policies) will ensure that the scale of development and the range and type of services, facilities and employment provision will be commensurate with the tier status of the settlements to which these sites are attached. These allocations are expected to enhance the respective roles and functionality of the Main Towns (Stonehouse and Cam & Dursley), Local Centres (Hunts Grove) and Accessible Settlement with Local Facilities (Hardwicke), by growing, strengthening and diversifying existing access to services, facilities and employment.

19. Very small settlements are not included in the hierarchy and instead are considered to be part of the countryside. Is this approach justified?

- 2.19.1 The idea of defined settlements is a long-established feature of Stroud District's planning policy framework, as the introduction to the 2018 SRFSU explains (EB72 paragraphs 1.4 – 1.8). The use of settlement 'boundaries' as a planning policy tool was first introduced into Stroud District through the 1992 draft Local Plan, enabling the development of a policy framework which could distinguish

between the District's countryside and its more populous, concentrated and high-functioning settled areas. Those defined settlements and their 'boundaries' (with some modifications) have been carried through subsequent adopted Local Plans (2005 and 2015).

- 2.19.2 There are numerous small settlements and hamlets across Stroud District that are not defined as settlements in the Local Plan and do not have settlement development limits. Local Plan policies treat such undefined settlements as 'countryside', where the type and scale of permissible development is limited to that which accords with Core Policy CP15. These very small settlements lack even the very basic services and facilities of defined Tier 4b settlements.
- 2.19.3 Supporting text to Core Policy CP3 explains that the Plan's development strategy "...aims to prioritise growth at sustainable locations, in accordance with settlement hierarchy" (CD1, paragraph 2.9.15). Moreover, it is clear that one of the main aims of the settlement hierarchy is:
- "...to promote sustainable communities by bringing housing, jobs and services closer together in an attempt to maintain and promote the viability of local facilities and reduce the need to travel to services and facilities elsewhere..." including by "...concentrating housing growth in those settlements that already have a range of services (as long as there is capacity for growth), and restricting it in those that do not."* (CD1, paragraph 2.9.15).
- 2.19.4 The Plan's development strategy is supported by robust evidence in the form of sustainability appraisal which concludes that a dispersed pattern of development is less sustainable than a concentrated development approach, with development focussed on settlements at a higher level in the settlement hierarchy. The hierarchy itself is justified by a comprehensive assessment of the role and function of settlements.
- 2.19.5 The Council considers that the use of settlement development limits and a settlement hierarchy policy to help focus growth towards locations that offer the best opportunities for sustainable development (and away from more remote and rural locations that do not) is a justified approach. This approach enables the delivery of sustainable development in accordance with national policy (NPPF para.35d, para.79-80), whilst taking local circumstances into account, to reflect the character, needs and opportunities of this area (NPPF para.9, para.78).

20. Settlement development limits (SDL) or boundaries have been identified. Appendix A details proposed changes to some existing SDL on the policies map.

- a. Is it clear how SDL have been defined and are they justified and effective?
- b. Are the reasons for the proposed changes to the SDL clearly explained? Do they just incorporate completed development into the settlement boundaries? Do any of the proposed changes involve land within the AONB?

- 2.20.1 The Plan's strategic approach to settlement development limits (SDLs) is evidenced through the discussion paper Review of Settlement Development Limits (April 2018) (EB74), which followed the 2017 Issues and Options consultation (where the idea of abandoning or changing the current local plan's strategic approach to settlement boundaries was mooted) (EB104, page 30).
- 2.20.2 The discussion paper (EB74) explains that SDLs are intended as a tool to help manage the growth and development of the district's settlements, with four main objectives:
- To direct development to appropriate and sustainable locations across the District;
 - To protect the countryside from isolated and inappropriate development;
 - To ensure that new development is sympathetic in scale and location to the form and character of our settlements; and
 - To prevent the uncontrolled expansion of settlements and potential coalescence.
- 2.20.3 These four points are included as supporting text for Delivery Policy DHC1, which fundamentally relies on settlement development limits for its effective application (CD1, para. 4.32)
- 2.20.4 The Council considers that these objectives and the function of SDLs are justified and effective. These objectives have steered the definition of individual SDLs and have served as a 'health check' when considering any potential revisions.
- 2.20.5 Whilst the reasons for the proposed changes set out in Appendix A have not been individually explained within the Plan, the Council considers each one to accord with the function and objectives behind SDLs, as set out in EB74 and Policy DHC1.
- 2.20.6 The Council conducted a systematic review of SDLs in 2018, following the Issues and Options consultation which suggested a continuation of the current local plan's strategic approach to settlement boundaries. The review was therefore intentionally limited in scope, focusing on adjusting and updating the development limits around existing settlements.
- 2.20.7 Re-drawing settlement development limits as a means of providing 'room for expansion' is not part of the Plan's strategic approach and did not factor in the SDL review. Housing monitoring data demonstrates that brownfield windfall development within SDLs is continuing and has not dropped off. The Plan instead allows for continuing redevelopment within SDLs and planned expansion (via site allocations) and enables some limited growth beyond the SDL (via exception criteria in development management policies, including HC4, DHC2, DHC3, EI10, EI11). These allocations and policy tools enable proper scrutiny of development proposals.
- 2.20.8 A series of proposed SDL changes was published for consultation in the Emerging Strategy Paper November 2018 (EB105), which explained that *"we have reviewed existing settlement development limits and we are considering minor changes to a number of settlement development limits, to reflect physical*

changes since the last review and to better reflect their intended function in terms of managing growth”* (EB105, page 44). *The 2018 discussion paper clarifies that the last SDL review was carried out in 2013, as part of the previous local plan review (EB74, page 2).

- 2.20.9 A set of criteria was established and used when reviewing settlement development limits. The following general principle has been assumed:
- The development limits have been drawn tightly around settlements, thereby limiting the potential number of infill development plots and windfall sites (mainly on greenfield land) within the boundary. The limits generally identify the area beyond which development could not realistically be regarded as infill, but which would instead result in outward expansion into the countryside.
- 2.20.10 The development limits follow well-defined physical features (e.g. walls, hedges, watercourses, roads, and footpaths) and the following types of development have generally been excluded:
- a) buildings in spacious grounds (except where the building(s) relate closely to the main built-up part of the town or village).
 - b) individual buildings or small groups of buildings separated by roads from the village.
 - c) isolated buildings or sporadic/'ribbon development' beyond the 'main' built-up part of the village.
 - d) institutional uses (e.g. schools) where they have extensive grounds and are on the edge of the village unless they comprise an integrated element within the village.
 - e) farmsteads on the edge of the village and farm buildings where they relate more to the countryside than to the built-up part of the village. (Modern sheds and other large storage buildings have generally been excluded to avoid inappropriate and large scale redevelopment proposals.)
 - f) employment sites which extend well beyond the main built-up area of the village, the redevelopment of which would distort the pattern of the settlement.
 - g) agricultural workers dwellings, affordable housing schemes and other developments approved as an exception to normal planning policy which are located on the edge of the village.
 - h) areas of existing development/new allocations where they are outside, and distinct from, the main built up part of the settlement (e.g. some industrial sites and estates located wholly separate from the settlement itself).
- 2.20.11 The public were invited to suggest potential SDL changes at Issues and Options stage (2017) (EB104, page 30), Emerging Strategy stage (2018) (EB105, page 44) and Draft Plan stage (2019). At each stage of plan preparation, all new suggestions were evaluated, bearing in mind the SDL objectives and policy intent, and having regard to the current built or natural form within each potential location.
- 2.20.12 Additional SDL changes suggested through the 2019 Draft Plan consultation are itemised within the Draft Plan Consultation Report (April 2021), along with the

council's response, explaining why some additional SDL changes will be taken forward (CD4d page 134-135). The response explains that *"The Council has reviewed each of the suggested changes to the settlement limits, assessing the existing development and natural feature characteristics of the locality and following any new development completion"*.

- 2.20.13 At the conclusion of Appendix A, the submission Plan lists a further five SDL changes that were not included in the Draft Plan, with the following explanation: *"In response to public consultation and our evidence base, additional SDL changes will be made at the following settlements, where recent development has been completed since the Draft Local Plan consultation in 2019"*.
- 2.20.14 Of the proposed SDL changes mapped in Appendix A of the Plan, the majority simply incorporate completed development into the settlement, reflecting physical changes that have tangibly occurred since the last review (2013). These changes recognise that the perceived and actual 'settlement edge', the point where urban form transitions to countryside, has changed since the last local plan review:
- BER01, CAM01, CBR01, CBR02, DUR01, EAS01, HAR01, HIL01, HOR01, HOR02, HOR05, KST01, LEO01, MID01, NEW01, STO01, STR01, STR02, ULY01, WHI01, WHI02, WHI04, COA01, KIN01.
- 2.20.15 At Eastington (SDL-EAS02), the SDL change comprises some deletion as well as addition to the SDL, correcting errors in the way the original SDL had been drawn (unattached to identifiable features on the ground), as well as the effects of new development. Similarly, HOR03, HOR04, HOR06 and WHI03 represent minor realignments to correct previous drafting inaccuracies, errors or inconsistency.
- 2.20.16 At Kingswood, SDL-KIN02 represents a deletion from the SDL, to exclude an area of planned open space adjacent to Chestnut Park, which had been included within the SDL at the last local plan review, but reads as a break in the settlement edge in form and character.
- 2.20.17 Proposed SDL-MIS01a comprises an entirely new settlement development limit, to newly define Miserden as a Tier 3b village (hitherto classified as 'countryside' in previous local plans), as a result of appraisal through the 2018 SRFSU (EB72).
- 2.20.18 The following settlements subject to proposed SDL changes lie inside the Cotswolds AONB: Hillesley (HIL01), Horsley (HOR01 – HOR06), Middleyard (MID01), Miserden (MIS01a), Uley (ULY01) and South Woodchester (SWD01). At Leonard Stanley, proposed change SDL-LEO01 abuts the AONB boundary.

- c. It appears that the SDL proposed changes do not extend to include some committed development sites currently under construction and the proposed site allocations within the Plan. Whilst some explanation has been provided in the Council's response to the representations, we remain concerned that this approach would create policy conflicts for

decision-makers when determining future planning applications for these sites, as they would be outside the defined SDL. Can the Council provide more detailed clarification on why they consider their approach is sound?

2.20.19 The proposed SDL changes do not include the Plan's edge-of-settlement site allocations and urban extensions. As outlined above, the SDL review also did not seek to include committed development, only substantially complete development or instances where physical change had been effected at the time of assessment. There will clearly have been further changes 'on the ground' at some settlements since the Plan was published for pre-Submission consultation in May 2021, and indeed since it was submitted in October 2021.

2.20.20 The Council's explanation for this approach (in response to representations that questioned it) is set out in the Summary of Regulation 20 responses to the Pre-Submission Draft Plan (Regulation 19 Consultation) PART 2: Local Plan Policies (SLP-01b), as follows:

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 ... settlement development limits may be amended to reflect the revised built extent of development, as part of a comprehensive review.

2.20.21 The Council's position is that the Plan's presumption in favour of development inside settlement development limits presents a risk of undermining the coordinated delivery of allocated sites in accordance with national policy and the Plan's strategic objectives. The Council considers the Plan's fundamental approach to site allocations (i.e. not pre-emptively extending SDLs to include them) is justified, appropriate and pragmatic, representing the best strategy to ensure extensions to existing villages and towns are well located and designed, and supported by the necessary infrastructure and facilities (NPPF, para.73).

d. Are any changes to the SDL for some settlements, as suggested through the representations, necessary for soundness?

2.20.22 Further SDL changes were suggested in response to the pre-Submission Draft Plan consultation (Reg 19) (2021). These are summarised within the Summary of Regulation 20 responses to the Pre-Submission Draft Plan (Regulation 19 Consultation) PART 2: Local Plan Policies (SLP-01b) and they fall into three categories:

- A minor boundary amendment to the Cam & Dursley SDL, within the garden of a private dwellinghouse at Dursley, within the Cotswolds AONB and in an area deemed to have high sensitivity to housing development (rep. no.888. SLP-01b, page 64). The Council does not believe this amendment would be justified or consistent with national policy.
- The division of the existing Chalford SDL into two separate settlements, to reflect topographical and functional differences between the parts of the village known as Chalford Hill (north) and Chalford Vale (south) (rep. nos.909 and 863. SLP-01b, pages 49 and 51). The Council's response to Question 15(b), above, provides some background to this.
- Substantial SDL extensions to take in areas of committed development and/or sites currently under construction and/or allocated sites. Specifically, representors sought alterations to the Cam & Dursley SDL, in order to reflect permissions granted and built development, both existing and under construction and the Plan's general intention for the settlement to be a focus for strategic growth (rep. no.915. SLP-01b, page 60); and the inclusion of all the Plan's strategic urban extension sites within settlement development limits, particularly site G1 at Hardwicke (rep. no.948. DLP-01b, page 62).

2.20.23 Again, reference to the main objectives of SDLs within Stroud District is useful (as set out in discussion paper EB74 and supporting text for Delivery Policy DHC1 (CD1, para. 4.32). Settlement development limits are intended as a tool to help manage the growth and development of the district's settlements, with four main objectives:

- To direct development to appropriate and sustainable locations across the District;
- To protect the countryside from isolated and inappropriate development;
- To ensure that new development is sympathetic in scale and location to the form and character of our settlements; and
- To prevent the uncontrolled expansion of settlements and potential coalescence.

2.20.24 The Council concedes that it is possible to make a case to justify the bisection of Chalford into two separately defined settlements. However, the Council maintains that evidence drawn from the 2018 SRFSU (EB72) indicates that neither Chalford Hill nor Chalford Vale would be 'demoted' from Tier 3a to Tier 3b as an inevitable consequence of such a split: both areas independently meet criteria commensurate with the role and function of Tier 3a Accessible Settlements with Local Facilities. Altering the boundary in the manner proposed would have little or no practical implications in development management terms, bearing in mind the objectives referenced above and the nature of the Plan policies that include SDL-based criteria.

2.20.25 The Council considers that the current SDL is an appropriate strategy for Chalford, taking into account reasonable alternatives, and based on proportionate evidence.

- 2.20.26 It is worth noting that within the Plan there are several SDLs that encompass ‘conjoined’ settlements – including Brimscombe & Thrupp (3a), Whiteshill & Ruscombe (3b), even Tier 1 Cam & Dursley. Arguably, the Stroud SDL also takes in areas that many will consider ‘separate communities’ (Cainscross and Rodborough, for example).
- 2.20.27 The Council considers the Plan’s fundamental approach to site allocations (i.e. not pre-emptively extending SDLs to include them) is justified, appropriate and pragmatic, representing the best strategy to ensure extensions to existing villages and towns are well located and designed, and supported by the necessary infrastructure and facilities (NPPF, para.73).
- 2.20.28 As outlined above, the SDL review also did not seek to include committed development, only substantially complete development or instances where physical change had been effected at the time of assessment. The SDL review had a cut-off point, prior to the publication of the draft plan for pre-Submission consultation in May 2021, and the Council considers this to be proportionate evidence. There have, however, been further changes ‘on the ground’ at some settlements since then (and indeed since the Plan was submitted in October 2021) Most notably, the large urban extensions SA2 West of Stonehouse and SA3 Northeast of Cam (allocated in the 2015 local plan) and the 2005 allocation at Hunts Grove are now well advanced and partially inhabited. The Council is not currently proposing to re-open the SDL review at this stage, in order to incorporate further areas of completed development.
- 2.20.29 Having reviewed each of the suggested changes to settlement development limits, assessing the extent of existing development as well as the character and natural features in the locality, and bearing in mind the main objectives and policy intent of settlement development limits, the Council does not consider any further SDL changes are necessary for soundness.
21. The hierarchy indicates that for Tiers 1, 2 and 3a further development may ‘exceptionally’ be permitted adjacent to the SDL, subject to meeting other Plan policies. For Tiers 3b and 4 the policy indicates that there could be scope for some or very limited development on land adjoining settlements, to meet specific local needs. Figure 3 in the Plan (pages 56 and 57) lists the types of development that could be permitted adjoining SDL, for each settlement tier.
- a. Is development outside the proposed SDL necessary to meet identified needs and if so, why are site allocations in these locations not being proposed or boundaries moved to accommodate this? Or will such development be ‘exception sites’?
- 2.21.1 The Council has already explained (in response to Question 20, above) that the Plan’s strategic approach to Settlement Development Limits is to define the current extent of existing settlements, marking the transition to countryside, with a view to:

- directing development to appropriate and sustainable locations across the District;
- protecting the countryside from isolated and inappropriate development;
- ensuring that new development is sympathetic in scale and location to the form and character of our settlements; and
- preventing the uncontrolled expansion of settlements and potential coalescence.

2.21.2 Settlement Development Limits are emphatically not intended to be re-drawn in order to provide 'room for expansion'.

2.21.3 CP3 is also clear that any development occurring outside SDL will be "exceptional" and that such development will be subject to criteria set out in Core and Delivery policies. Core Policy CP15 is the principal strategic policy for managing growth in the countryside and outside SDLs, allowing development that would contribute to diverse and sustainable farming enterprises, recreation or tourism, the conversion of rural buildings and the provision of essential community facilities. Other policies, including HC4, DHC2, DHC3 and DHC4, also allow for some limited development outside SDLs to address specific identified local needs, including affordable housing. Each of these policies is designed to address evidenced 'exceptional' needs, not general development needs, and each policy sets out tight criteria and limitations. Please also see responses to Questions 21(c) and 22(b), below.

2.21.4 The Plan's strategic approach to meeting the District's housing and employment requirement for the plan period is to allocate sites in the most sustainable locations (both large strategic sites and smaller local sites are identified in Core Policy CP2) and to enable development within designated areas, where housing, employment and retail development are considered appropriate (Core Policy CP2, supporting text para. 2.9.12) – including within SDLs and key employment sites. Tables 2, 3, 4 and 5 (CD1, pages 33, 34, 37 and 40) illustrate how the Plan's minimum housing and employment requirements will be met in this way.

2.21.5 Other than where suitable site allocations have been identified (through a rigorous site selection process, as evidenced by the Council's Topic Paper – Assessment and selection of sites October 2021, EB9), the development strategy does not seek to meet general development needs outside of settlement development limits. In particular, meeting the District's general development needs outside lower tier settlements (Tiers 3b, 4a or 4b) would constitute an unsustainable dispersal strategy and, accordingly, no sites have been allocated at these settlements. However, the development strategy recognises that 'exception' policies are a key tool to help communities meet special needs that can't be met via development inside settlements or on allocated sites (as highlighted by supporting text for Delivery Policy DHC2 Sustainable rural communities, for example).

- b. Is the Plan clear as to how decision-makers would determine whether the location of proposed development would be 'adjacent to settlements', 'edge of settlements', 'adjoining SDL' or 'immediately adjoining'?

- 2.21.6 The Council considers a location adjoining a settlement development limit is clear and unambiguous. Core Policy CP3 (and supporting text 2.9.16) refers to development “(exceptionally) adjacent to” settlement development limits for all tiers in the hierarchy, except for Tier 3a, where the term “(exceptionally) on the edge of settlements” is used instead. The Council does not consider this a consequential or intentional differentiation (diagram Fig.3 consistently uses the term “adjoining SDL” to illustrate the practical implications of CP3 and other Plan policies, for different tier settlements).
- 2.21.7 Importantly, CP3 states that such development will be subject to meeting criteria in the Plan’s Core and Delivery policies, some of which use further variations in terminology and/or tighter definitions. The inclusion of “close to” in policy DHC2, for example, is in recognition that some sites are well related to a settlement but do not share a boundary with defined settlement development limits. In these cases, the policy requires a judgement to be made by the decision maker, having regard to the settlement pattern, the local environment, character and landscape setting of the settlement.
- 2.21.8 The use of ‘on the edge of’ or ‘adjacent’ is within the context of a broad strategic policy and the detailed acceptability of a site is subject to meeting the criteria in delivery policies such as DHC2. Therefore, the Council does not consider the terminology used in this or other policies to be inconsistent or in any way contradictory.
- c. Is the purpose of Figure 3 in the Plan clear? Does it form the supporting text to Core Policy CP3 or does it form part of the policy? Is it clear to developers and decision-makers as to what type and scale of development may be acceptable adjoining the SDL and when the exceptions would apply? How have these been determined and are they justified and consistent with other Plan policies e.g. affordable housing?
- 2.21.9 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, allowing for holistic consideration of settlement specific needs, opportunities and constraints. Diagram Fig.3 illustrates the practical implications of policies, for different tier settlements.
- 2.21.10 Figure 3 does not form part of the policy wording for Core Policy CP3, but seeks to illustrate how the settlement hierarchy frames the development strategy for individual settlements; and how it provides a framework for the application of a small number of other plan policies that include hierarchy- and/or SDL-based policy criteria as a means of managing the location, scale and nature of housing, employment, tourism or leisure development.

- 2.21.11 The Council considers that the illustration provides a useful overview and a handy means of ‘signposting’ to relevant aspects of the development strategy and policy framework surrounding each hierarchy tier.
- 2.21.12 The Council concedes that some minor modification or addition to the Fig.3 title or caption (on page 56) would help to remove any ambiguity about the illustration’s status within the Plan document.
- 2.21.13 Moreover, the Council recognises that some of the wording and terminology used within the illustration could be tightened up and modified, to remove any confusing inconsistencies with specific terms that are used within the policies that the diagram draws from. The ‘signposting’ function of this illustration would also be improved by the addition of specific policy references. For example, in the image relating to Tier 1 settlements (page 56), the text under the heading “Adjoining SDL” could be amended as follows:

- *Exception sites: 100% affordable housing, including entry-level homes and affordable self-build/custom build homes (HC4)*
- *Single plots: affordable self-build or custom- build homes (HC4, HC3)*
- *Live-work development (DHC3)*
- *Tourism / leisure development, subject to criteria (EI10, EI11)*

22. The text on page 23 of the Plan also states that some limited development on small and medium sites immediately adjoining SDL for tiers 1-3 will be allowed, to meet specific identified local development needs.

- a. What is the status of this text and is it consistent with the policy wording in Core Policy CP3? If not, are any changes necessary to remove any ambiguity and ensure policy effectiveness?
- b. Is it clear how local needs will be defined and what will be the criteria for this?

- 2.22.1 The text on page 23 of the Plan sits within Section 2.3, entitled ‘An introduction to the development strategy’. This text is introductory and explanatory, providing a useful summary of the development strategy’s main thrust or “headlines” (CD1, page 23), as well as an overview of what the strategy and plan policies mean in broad terms for different parts of the District (“What this strategy means for where you live”, page 25). Paragraph 2.3.11 is not solely referencing Core Policy CP3, but rather the Plan’s policy framework as a whole, which includes a small number of plan policies that ‘hang’ off Core Policy CP3 by using hierarchy- and/or SDL-based policy criteria as a means of managing the location, scale and nature of specific forms of development.
- 2.22.2 The Council considers this wording to be broadly consistent with that of CP3 and other relevant policies in the Plan, but there are discrepancies.
- 2.22.3 Core Policy CP3 allows for some limited development on small and medium-sized sites immediately adjoining settlement development limits at Tier 1-3 settlements, in order to meet specific identified local development needs:

- At Tiers 1, 2, 3a and 3b, the CP3 policy wording clearly references the “exceptional” nature of such development and links this to the need to fulfil criteria set out in the Plan’s other Core and Delivery policies.
- However, there are discrepancies in how the CP3 policy wording refers to the location of such development: variously, the terms “adjacent to settlement development limits” (Tiers 1 and 2), “on the edge of settlements” (Tier 3a) and “adjacent to the settlement development limit” (Tier 3b – and also Tiers 4a and 4b) are used. This matter is touched upon in response to Question 21(b), above, and the Council recognises that some minor text modifications to CP3 and other policies could ease the effective implementation of these policies by removing any ambiguity.
- A requirement for such development to meet “specific local needs” is only specified in relation to Tier 3 settlements (and also Tier 4 settlements).

2.22.4 The text on page 23 refers to “*exception sites for first time buyers, self build and custom build housing and rural exception sites*” as permissible forms of development to meet specific identified local development needs. This pertains to Delivery Policy HC4 Local Housing Need (Exception Sites), which allows for “*affordable housing, including entry level homes, and single plot self-build or custom-build affordable dwellings*” on sites outside settlement development limits at Tier 1-4 settlements (directed preferably to Tier 1-3 settlements) (CD1, page 235).

2.22.5 HC4 requires “clearly evidenced local need” (criterion 1) and the policy’s supporting text (paragraph 4.46) specifies what form of evidence will be required in order to demonstrate local need and local connection, including “*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*”.

2.22.6 The Council considers the wording (in paragraph 2.3.11) accords with the policy criteria set out in policy HC4. There is no specific reference In Core Policy CP3 to meeting identified “local need” in relation to exception sites at Tier 1 and 2 settlements – but HC4 does require it. The Council does not consider this to be a policy contradiction, since CP3 does caveat such development at Tiers 1 and 2 with the words “*...subject to fulfilling the criteria set out in the Plan’s Core and Delivery policies*”.

23. Paragraph 2.3.12 of the Plan also sets out support for some development at tier 3b, 4a and 4b settlements of small sites up to 9 dwellings outside of defined settlement limits, provided that the policy is supported by the local community.

- a. Which policy is being referenced here? Is it Core Policy CP3, Delivery Policy DHC2 or some other policy?

b. How will the Council determine that the policy is supported by the local community? Will this be at the point of adoption? If so, what is the purpose of this supporting text?

- 2.23.1 The text at paragraph 2.3.13 of the Plan refers to Delivery policy DHC2 Sustainable rural communities. DHC2 is one of a small number of plan policies that ‘hang’ off Core Policy CP3 by using hierarchy- and/or SDL-based policy criteria as a means of managing the location, scale and nature of specific forms of development – in this case, small schemes of up to 9 dwellings at Tier 3b and Tier 4 settlements.
- 2.23.2 Paragraph 2.3.12 does indeed include the words “provided that the policy is supported by the local community”. However, the Council believes this is a typographical error. It should read “proposal” or “proposed development” (or similar), since this is intended to be a reference to the provisions set out in Delivery Policy DHC2 (Sustainable rural communities).
- 2.23.3 DHC2 includes criterion 3, which requires development proposals that are subject to consideration under this policy to be *“included within a Neighbourhood Development plan or... supported by the relevant parish council”* (CD1, page 233).
- 2.23.4 During the local plan consultation process, a number of parish councils expressed support for the policy but considered they would not have the resources to develop a neighbourhood plan. As a result, the support of the parish council for a proposal is considered to be an essential component of criterion 3, to ensure the policy is effective.
24. Core Policy CP3 does not specify an ‘up to 9 dwellings’ limit, though Delivery Policy DHC2 does.
- a. Why has a limit of 9 dwellings been identified for these tiers? Is this justified by robust evidence? Reference is made to the 9 dwelling limit in Figure 3 but this does not appear to form part of Core Policy CP3. Is this correct?
- 2.24.1 As explained above in response to Question 21(c), Figure 3 does not form part of the policy wording for Core Policy CP3, but seeks to illustrate how the settlement hierarchy frames the development strategy for individual settlements; and how it provides a framework for the application of a small number of other plan policies that include hierarchy- and/or SDL-based policy criteria as a means of managing the location, scale and nature of housing, employment, tourism or leisure development.
- 2.24.2 The reference to “up to 9 dwellings” pertains to Delivery Policy DHC2 (Sustainable rural communities), which applies to Tier 3b, 4a and 4b settlements only.
- 2.24.3 The Plan’s development strategy relies upon strategic and local allocations, together with a small windfall allowance to meet the identified housing

requirements for the District. The purpose of Delivery Policy DHC2 is not to deliver the housing requirement for the District but to meet specific local needs arising from smaller settlements. Within this context the Council considers it would be inappropriate to provide for major development sites (10 or more dwellings) at small settlements where the development strategy is not seeking to make local site allocations (which are all 10 or more dwellings). To do so has the potential to undermine the development strategy.

- 2.24.4 An upper limit of 9 dwellings means that proposals on DHC2 sites would fall short of the definition of residential 'major development' (set out within the Glossary, Appendix E) and would not be subject to the requirements in Core Policies DCP2, CP8 and CP9. It is unreasonable to expect smaller sites to provide for a full range of housing to reflect local needs, and Policy DHC2 sets out bespoke criteria, tailored to smaller sites, with the stated goal of maintaining the social sustainability of smaller rural settlements. Further detail is provided in response to questions under Matter 7c (Other housing policies).
- b. In addition Figure 3 also states that for these tiers such development would be 'not exceeding a 10% cumulative increase in the settlement's total dwellings during the Plan period'. How will this be assessed and is this approach justified? Should this be included in the policy wording or does Figure 3 form part of the policy?
- 2.24.5 As above, Figure 3 does not form part of the policy wording for Core Policy CP3, but seeks to illustrate how the settlement hierarchy frames the development strategy for individual settlements; and how it provides a framework for the application of a small number of other plan policies that include hierarchy- and/or SDL-based policy criteria as a means of managing the location, scale and nature of housing, employment, tourism or leisure development.
- 2.24.6 The reference to "10% cumulative increase" pertains to Criterion 4 of Delivery Policy DHC2 (Sustainable rural communities), which requires that "*the proposal would not lead to a cumulative increase of more than 10% of the settlement housing stock as at 2020*". There is no need for this to be included within the policy wording for CP3.
- 2.24.7 Whilst the Council considers that the local needs exceptional policy approach justifies an individual size threshold of 9 dwellings, many respondents during consultation expressed concern that multiple proposals at the same settlement over time could lead to unacceptable growth levels at those settlements without the necessary services and facilities to support them.
- 2.24.8 Supporting text for policy DHC2 explains that "*In order to maintain the distinct character and appearance of these smaller settlements, it is essential that this policy is subject to active management and control*" ... "*cumulative change through a series of small scale developments should be limited to an increase of no more than 10% of the settlement housing stock within defined settlement limits at the start of this plan period*".

- 2.24.9 The 2018 Stroud District Settlement Role and Function Study Update (SRFSU 2018) (EB72) includes settlement size ‘approximations’ for Tier 1-3 settlements (using 2011 census data as a baseline). The Study also recorded all settlements’ housing growth up to 2018, using data from annual Housing Land Availability (HLA) reports (EB72, Table 1, page 12).
- 2.24.10 The largest Tier 3b settlement of Whiteshill & Ruscombe consisted of 501 dwellings in 2018, with Tier 4 settlements smaller in size (the SRFSU 2018 does not provide a census-based ‘baseline’ for Tier 4 settlements). Completions for the period 2011-2018 indicate that Tier 3b and Tier 4 smaller settlements typically grew in size between 1 and 4%. A 10% cumulative increase for the 20 year Plan period would therefore provide some opportunities for small scale growth at or slightly above historic levels of growth. However, levels of growth above 10% would lead to a level of dispersal which would not be in accordance with historic patterns of growth or the objectives of the development strategy.
- 2.24.11 In order to provide a robust baseline for the implementation of this policy, the Council will produce an addendum to the Stroud District Settlement Role and Function Study, rebasing the size of settlements in the settlement hierarchy to 2020, using completions set out within housing land availability reports.
- 2.24.12 Further detail about delivery policy DHC2 is provided in response to Matter 7c (Other housing policies).
- c. How does Core Policy CP3 relate to Delivery Policy DHC2? Are the policies consistent or is there unnecessary duplication and/or unclear requirements?
- 2.24.13 The settlement hierarchy set out in Core Policy CP3 frames the development strategy for individual settlements; it provides a framework for the application of a small number of other plan policies that include hierarchy- and/or SDL-based policy criteria as a means of managing the location, scale and nature of specific forms of development. In this respect, CP3 does not extend to detailed matters that are more appropriately dealt with through the Plan’s delivery policies and is consistent with the relationship between strategic and non-strategic policies, as described in national policy (NPPF paragraphs 21, 28).
- 2.24.14 While Core Policy CP3 applies to all settlements, DHC2 applies to Tier 3b and Tier 4 settlements only. DHC2 ‘hangs off’ the settlement hierarchy, but has its own criteria and remit, which is narrower than that of Core Policy CP3.
25. The text on page 23 of the Plan also states that limited housing within the AONB will be supported to meet needs arising from within the AONB.
- a. Is this clearly set out in policy and if so, how will this be assessed by a decision-maker determining future planning applications?
- b. Is this approach consistent with paragraphs 176 and 177 of the Framework in regard to the AONB?

- 2.25.1 The text on page 23 of the Plan sits within Section 2.3, entitled ‘An introduction to the development strategy’. This text is introductory and explanatory, providing a useful summary of the development strategy’s main “headlines”, as well as an overview of what the strategy and plan policies mean in broad terms for different parts of the District.
- 2.25.2 Paragraph 2.3.13 on page 23 states that in order to “*support the social wellbeing of AONB communities, the strategy supports limited housing development to meet needs arising from within the AONB*”. This strategic approach is to be effected through two targeted Local Sites Allocations (PS05 at Minchinhampton and PS41 at Painswick) plus a small number of distinct policies and individual criteria within them.
- 2.25.3 The policy wording for both site allocations PS05 and PS41 specifies “*affordable housing will be for those with a local connection to address local housing needs within the AONB*”; and Core Policy CP9 (Affordable housing) is 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*” – the supporting text for CP9 sets out that local needs will be evidenced through Local Housing Needs Assessments and that the Council will prepare a Supplementary Planning Document to provide detail of how the policy will be implemented.
- 2.25.4 The site allocation policies for PS05 and PS41 do not specify that market housing on these sites will meet needs arising from within the AONB. That is, however, the Council’s expectation – as the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39, paragraphs 4.12 – 4.14) explains.
- 2.25.5 Justification for the role of both Minchinhampton and Painswick in the development strategy and the allocation of sites PS05 and PS41 to meet identified local needs arising from within the AONB is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), 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).
- 2.25.6 As Tier 2 Local Service Centres, Minchinhampton and Painswick are the highest functioning AONB settlements within Stroud District and have (in the words of Core Policy CP3) “*the ability to support sustainable patterns of living in the District, because of the facilities, services and employment opportunities they each offer*”. EB39 explains the Council’s strategic approach to allocating sites at Tier 2 settlements within the AONB, in order to meet identified housing needs arising solely from within the AONB. The Policy Assessment paper sets out why the Council considers this approach to accord with paragraphs 176 and 177 of the NPPF, with National Planning Practice Guidance and with the Cotswolds Conservation Board’s AONB Management Plan (EB119).
- 2.25.7 National planning practice guidance says:
- “The National Planning Policy Framework makes clear that the scale and extent of development in these areas should be limited, in view of the importance of conserving and enhancing their landscapes and scenic*

beauty. Its policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas” (National Planning Practice Guidance paragraph 041 reference ID: 8-041-20190721 Revision date: 21 07 2019).

- 2.25.8 As the Council argues in EB39, it would seem reasonable to conclude therefore that development within the Cotswolds AONB should be based on needs arising from within the AONB. This principle is reflected in Policy CE12 of the Cotswolds AONB Management Plan 2018-2023, which states that *“Development in the Cotswolds AONB should be based on robust evidence of local need arising within the AONB”* (Policy CE12, EB119).
- 2.25.9 This does not, of course, mean that development needs derived from within the AONB have to be accommodated at a specific location within the AONB, but it would certainly support the view that if a housing needs survey carried out at a settlement or parish within the AONB were to indicate housing need within that settlement or parish, then it would be appropriate, in principle, to seek to meet that need locally.
- 2.25.10 In addition to the site allocations, other policy tools within the Plan are designed to enable limited housing development inside the AONB, in order to meet needs arising from within the AONB. However, the Council concedes that the connection between these policy requirements and the Plan’s strategic intent in respect of the AONB is not spelled out overtly within the policy wording or supporting text:
- The Plan sets a lower threshold for the provision of affordable housing on sites within the AONB (any site capable of providing 4 or more dwellings, net, will be required to provide 30% affordable housing, as opposed to a threshold of 10 dwellings elsewhere), having regard to housing needs, site specific and other factors (CP9 Affordable housing);
 - Delivery Policy HC4 Local housing need (exception sites): allows for affordable housing on sites close to or adjoining settlements, including settlements in the AONB, subject to criteria – including a requirement for clearly evidenced local need, which cannot be readily met elsewhere in the locality. The supporting text (4.45-4.46) explains how the Council expects the extent and nature of local (affordable) housing need to be evidenced and sets out that the Council will prepare a Supplementary Planning Document to provide detail of how the policy will be implemented (4.49);
 - HC4 allows for single self-build or custom-build affordable dwellings on sites close to or adjoining settlements, including settlements in the AONB, subject to criteria, including proven need and local connection;
 - HC4 allows for some market housing in the mix (subject to viability evidence); but disallows exception sites comprising entry-level homes within the AONB, in accordance with national policy;
 - Delivery Policy DHC2 Sustainable rural communities: in order to maintain the social sustainability of smaller rural settlements, DHC2 allows for small

schemes of up to 9 dwellings adjoining the SDL at Tier 3b, Tier 4a and Tier 4b settlements, including settlements in the AONB. This is subject to criteria – including the 30% affordable housing requirement set out in CP9.

- DHC2 allows for some market housing but specifies a housing mix designed to address demographic imbalances in the local population and/or specific housing needs identified in a parish housing need survey (criterion 1). Supporting text (4.34-4.35) provides more detail about what is meant by this, and how it can be evidenced.

2.25.11 The Council considers the framework of criteria contained within these and other Plan policies (including Delivery Policy ES7 Landscape Character) will ensure that great weight is given to the conservation and enhancement of the AONB and that the scale and extent of development within it is limited, in accordance with NPPF paragraph 176. The strategy will meet proven needs, whilst avoiding the need for major development in accordance with paragraph 177.

2.25.12 The Council recognises that the Plan's strategic approach to meeting housing needs arising from within the AONB (which is effected through site allocations and a small number of distinct policies and individual criteria within them) could be more clearly elucidated within the Plan. A summary bullet point could be added on page 36, for example (Chapter 2.5 Housing | Meeting Stroud District's housing needs up to 2040) and minor additions to policy wording or supporting text (specifically PS05, PS41, HC4 and DHC2) might further improve the Plan's clarity and effectiveness. There is also an opportunity to reinforce this aspect of the strategy and the effectiveness of the policies through a future Supplementary Planning Document to support Core Policy CP9 and Delivery Policy HC4.

26. Overall, is the settlement hierarchy and how it relates to the development strategy clearly explained within the Plan and is the approach justified, effective and consistent with national policy?

2.26.1 The National Planning Policy Framework (NPPF) says that local plans should provide a positive vision for the future of each area; they should establish a framework for addressing housing needs and other economic, social and environmental priorities and they should reflect a presumption in favour of sustainable development (NPPF para. 11 and 15), indicating how the presumption will be applied locally (National Planning Practice Guidance. Paragraph: 036 Reference ID: 61-036-20190723) and guiding development towards sustainable solutions which take local circumstances into account, to reflect the character, needs and opportunities of each area (NPPF para.9).

2.26.2 The Council considers a settlement hierarchy to be a justified and effective pillar within a local plan's strategic framework and considers this approach to be consistent with national policy and an appropriate strategy for a rural district like Stroud. It is based on proportionate evidence (in accordance with NPPF para. 35), which seeks to explain the current and expected future roles and functions of each of the District's towns and villages, to help determine which places can support future growth and which places cannot. The approach is explained in Section 2.4 of the Plan, with reference to the evidence contained in Stroud

District Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the 2014 Stroud District Settlement Role and Function Study (EB71).

- 2.26.3 In his examination of the role played by the current settlement hierarchy in the 2015 adopted Local Plan's overall development strategy, the Inspector noted that *"The settlement hierarchy is a key element of the development strategy, helping to provide the framework and determine the distribution of future growth across the district"* (2015 inspectors report, EB115, paragraph 70). He concluded that:
- "Overall, SDC has achieved a reasonable balance in terms of the settlement hierarchy, concentrating new development at those larger, more sustainable settlements which have the potential to accommodate strategic development ...Policy CP3 establishes an appropriate, effective, sustainable and soundly based settlement hierarchy which reflects the existing and future role of these settlements."* (2015 inspectors report, EB115, paragraph 77).
- 2.26.4 As touched upon in response to Question 15(a), the Council believes the approach it has taken to reviewing and refreshing the existing Stroud District settlement hierarchy demonstrates robustness in terms of evidence-gathering and continuity in terms of broad strategic approach.
- 2.26.5 The Council considers the relationship between the settlement hierarchy and the Plan's development strategy is clearly explained within the Plan.
- 2.26.6 Chapter 2 of the Plan consists of an introduction to and summary of the development strategy. Within Chapter 2, Section 2.4 focuses specifically on Our Towns and Villages, explaining how the settlement hierarchy fits into the Plan's overall strategic approach and referencing the evidence behind it.
- 2.26.7 In addition to the summary set out in Section 2.4 of the Plan and the explanation provided within the supporting text for Core Policy CP3, the Council considers Figure 3 (the diagram spread across pages 56-57) to be a useful illustration to help explain how the settlement hierarchy frames the development strategy for individual settlements; and how it provides a framework for the application of those other plan policies that include hierarchy- and/or SDL-based policy criteria as a means of managing the location, scale and nature of housing, employment, tourism or leisure development.
- 2.26.8 Core Policy CP3 is a key part of the Plan's development strategy, which seeks to address the strategic priorities of the area and to provide a clear starting point for non-strategic and development management policies, in accordance with national policy (NPPF para. 21).

Site selection methodology

(Our questions here only relate to the site selection process. Questions on specific site allocations are set out under later matters. Also our questions on site selection to meet gypsy, traveller and travelling showpeople accommodation needs are set out in a later matter.)

The Council's methodology for site assessment and selection is set out within the Strategic Assessment of Land Availability 2016 (SALA) (EB18) and explained in the Topic Paper: Assessment and selection of sites topic paper (EB9).

Chapter 2 of EB9 summarises the site selection process timeline and lists the studies and assessments used to determine the suitability of sites for development along with their availability and achievability.

27. Is the site selection methodology justified and does it accord with national planning policy and guidance?

- 2.27.1 The Council considers that the site selection methodology is justified and accords with national planning policy and guidance.
- 2.27.2 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out how the Strategic Assessment of Land Availability (SALA) 2016 (EB18) was designed and carried out in accordance with national planning policy and guidance to identify additional potential land to meet the District's future housing, employment, retail or community needs and provide a full assessment of the suitability, availability and achievability of sites.

28. Has the site selection process been suitably informed by relevant studies/assessments and site constraints, and has it included a robust assessment of development impacts?

- 2.28.1 The Council considers that the site selection process has been suitably informed by relevant studies/assessments and site constraints and has included a robust assessment of development impacts.
- 2.28.2 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out the key studies and assessments used to inform the suitability of sites, in particular; Stroud District Landscape Sensitivity Assessment (EB35 & EB36), SALA Heritage Impact Appraisal (EB50 - EB53), SALA Transport Accessibility Assessment (EB112) and mapped flood risk and ecological assessment data.
- 2.28.3 SALA Methodology (EB18), para 4.12 – 5.4.6, sets out the factors considered in the assessment of the suitability of sites to provide a robust assessment of site suitability and development impacts including physical limitations, potential landscape, nature and heritage conservation and transport impacts and likely environmental/ amenity impacts for occupiers and neighbours.

2.28.4 Published SALA site assessment reports provide a summary of the policy constraints, physical constraints and potential impacts for each site identified as deliverable, developable or with future potential and demonstrate a robust assessment of development impacts informed by site knowledge, relevant studies/ assessments, and Local Plan policy (EB19b & c, EB20b & c, EB21b & c, EB22b & c). Where a site has been rejected by the SALA process because of development impacts, the published SALA report identifies the potential impacts and physical constraints preventing sustainable development (EB19d, EB20d, EB21d, EB22d).

29. Has the sequential test, and exception test where necessary, been correctly applied in the assessment of flood risk (including surface water flooding) for the selection of potential development sites? Is this adequately evidenced for all sites as part of the site selection process? Do any of the sites in the Plan fall within, wholly or partially, Flood Zones 2 or 3?

2.29.1 The Council has undertaken flood risk assessment work available at EB54 – EB54 a-II (inclusive). JBA Consulting undertook a Level 2 assessment of site options identified for potential allocation within the emerging Stroud Local Plan. It builds upon and replaces the Level 1 SFRA (2008) and Level 2 SFRA (2012 - 2014) for Stroud by incorporating revisions to national and local planning policy at the time of preparation, and providing a comprehensive set of updated maps presenting flood risk from all sources. This included defining Flood Zone 3b and assessing the impacts of climate change on Flood Zone 3a. The SFRA also provided guidance and updated information on surface water management and Sustainable Drainage Systems (SuDS), guidance for site-specific Flood Risk Assessments (FRAs) and opportunities to reduce flood risk to existing communities within the District of Stroud.

2.29.2 It should be noted that at the time of preparing the SFRA, the functional floodplain (Flood Zone 3b) was defined as the 1 in 20-year or 1 in 25-year flood extent. Following publication of the Planning Practice Guidance (PPG) update in August 2022, the functional floodplain has been defined as the 1 in 30-year flood extent, as well as areas designed to flood in larger events (e.g. flood storage areas). Site-specific Flood Risk Assessments prepared for sites within Stroud District will be required to meet the latest PPG guidance on defining the functional floodplain.

2.29.3 The SFRA has assessed and mapped all sources of flooding within the study area including fluvial, surface water, groundwater, sewers, canals and reservoirs. As part of the SFRA, all potential allocation sites, regardless of their viability, were screened for all sources of flood risk, and the flood risk vulnerability of the proposed development was considered. It is worth noting that the evidence prepared and exercise performed is exercise is well aligned with the requirements of the July 2021 changes to the NPPF and the subsequent amendments to the PPG.

2.29.4 The site screening spreadsheet (provided in Appendix O of the SFRA - EB54p) identified those sites at low risk from all sources of flood risk, and therefore considered to satisfy the Sequential Test and those where the risk of flooding

had implications for the principle of development were subject to a more detailed assessment of actual flood risk within the Level 2 SFRA in order to understand how sites could be safely brought forward in satisfying the Exception Test. Level 2 SFRA detailed site summary tables were produced.

- 2.29.5 The sites with a proportion within Flood Zone 2 or 3, shown to be at risk of fluvial flooding from watercourses running either through or adjacent to the site were carefully considered. No sites were taken forward if there were reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The appropriateness element considered the SALA assessment process, the SFRA2 outputs and Sustainability Appraisal results (across a wide number of objectives, including flood risk (objective 12).
- 2.29.6 Whilst the evidence base document does not present the Sequential Test and Exception Test separately, the overarching Council site selection process implicitly incorporated the conceptual approach and made use of the relevant evidence to sequentially select allocation sites and avoid inappropriate development in areas at risk of flooding. This approach included evidence that accounted for all sources of flood risk in accordance with the latest policy and guidance. Consideration of flood risk in relation to other constraints in the selection of sites for allocation is evidenced in Topic Paper: Assessment and selection of sites topic paper (EB9) sets out in detail the site selection process at each stage of the Local Plan review and how this has been suitably informed by evidence base studies, Sustainability Appraisal (SA) and representations received through Regulation 18 and Regulation 19 public consultation on the emerging Local Plan.
- 2.29.7 Where suitable sites at low risk were not reasonably available and development was required to be allocated in areas at risk of flooding, the sites were carried forward for assessment within the Level 2 Strategic Flood Risk Assessment. The L2 SFRA site assessments provided a detailed assessment of the actual flood risk (including residual risk and the impacts of climate change) and where appropriate identified constraints to development and potential flood risk mitigation recommendations so development could be implemented safely to address the second part of the Exception Test. Recommendations were also provided on the scope of the Flood Risk Assessments that would be required to support planning applications at the sites. The Council worked with the Environment Agency and other flood risk management authorities through the Local Plan making process as required by the NPPF. The Council excluded areas of flood risk from the developable areas identified in the SALA and reinforced this by applying flood risk safeguards in the site allocation policies themselves.
- 2.29.8 To demonstrate that the first part of the Exception Test has been satisfied, those sites selected within the Local Plan provide wider sustainability benefits to the community as demonstrated through the SA process. Officers, by excluding Flood Zone areas from the developable areas, will avoid areas of present day [and future] fluvial flood risk. The vulnerability of allocation sites has been taken into account as well as those sites not increasing flood risk elsewhere. This describes how the tests underpinning the sequential and exception tests are woven into the allocation selection process. This is in line with present day NPPF

policy and PPG practice. It included the impact of climate change on fluvial and tidal flood risk, as well as the risk of flooding from all other sources. The SALA selection of allocation sites shows how this was considered. Updates to the NPPF in July 2021, and to the PPG in August 2022, has reinforced this requirement for all sources of flood risk, both current and future, to be 'taken into account' which the Council has done. Masterplanning requirements shall allow flood resilience and compatibility to be incorporated into design and will intergrate sustainable drainage systems and make space for water within site layout and design. Delivery Policy ES4 seeks opportunities for improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management).

- 2.29.9 The combination of the SFRA2 work, SALA assessment, Sustainability Appraisal and Local Plan policy has led to the allocation of development in the lowest possible areas of flood risk when there are reasonable alternatives. At locations where there is flood risk the work has also identified the hazards to be addressed and measures that could be implemented so the principle of development is supported. The Council considers that the sequential test, and exception tests have, where necessary, been applied in the assessment of flood risk (including surface water flooding) for the selection of potential development sites.
- 2.29.10 A Total of 399 sites were screened against flood risk. 19 sites were taken forward to Level 2 (where flood risk was a material issue)

Site summary table

Site code	Site name	Comments
G1	Land south of Hardwicke	7% of land is in FZ 3a and 1% in FZ2 is at fluvial flood risk. The site is identified as at low risk of groundwater flooding. The site is at moderate risk of surface water flooding, with dispersed areas of ponding predicted to occur in low points across the site. This was considered as acceptable in flood risk terms.
G2	Land at Whaddon	5% of land is in FZ 3a and 2% in FZ2 is at fluvial flood risk. The surface water flood risk across the site is largely associated with the fluvial flood extents of Daniel's Brook and its tributary watercourses. The site is at low risk of groundwater flooding This was considered as acceptable in flood risk terms.
PS01	Brimscombe Mill	54% of land is in FZ 3b, 14% of land is in FZ 3a and 9% in FZ2 is at fluvial flood risk. This site passed a sequential and exception test in 2015 as part of the Last Local Plan. The site can be made to work – but a challenge weighed with the wider environmental benefits and the

		heritage and regeneration benefits the site offers. Like Brimscombe Port
PS02	Brimscombe Port	Being developed in partnership with St Modwen and has planning permission S.19/1502/FUL for infrastructure works, demolition and flood risk alleviation matters. It is noted that planned canal regeneration works at Brimscombe Port will include provision of additional storage for water within the reinstated canal, as well as ground raising in areas of the site, which are proposed to manage and reduce existing flood risk to the site from the River Frome and mitigate potential effects.
PS09	Rooksmoor Mill	Whilst on Nailsworth stream – Site has planning permission following a detailed FRA.
PS11	Merrywalks Arches, Merrywalks, Stroud	10% of land is in FZ 3a and site mostly Zone 1. The south west corner of the site is predicted to be at risk of surface water flooding. It should be noted that the surface water flood maps are influenced by the existing building on the site, and therefore the flood outlines are likely to change with development. The site is at moderate to high susceptibility to flooding from groundwater. This was considered as acceptable in flood risk terms.
PS19a	Stonehouse Northwest	99% zone 1. Three large surface water flow paths form at the northern, southern and south western boundaries of the site. The site has a low to moderate likelihood of groundwater emergence. This was considered as acceptable in flood risk terms.
PS20	M5 Junction 13	79% zone 1. Application with detailed FRA approved. This was considered as acceptable in flood risk terms.
PS25	East of River Cam	95% zone 1 - The south western border of the site is predicted to experience surface water flooding during the 1 in 30 and greater flood events. However, this is associated with the low-lying floodplain of the River Cam and therefore should not be considered in addition to fluvial risk. The site is at low risk of groundwater emergence. This was considered as acceptable in flood risk terms.
PS30	Hunts Grove Extension	91% zone 1 - The site is at low risk of flooding from surface water. The site has a low likelihood of groundwater emergence. This was considered as acceptable in flood risk terms.
PS33	Northwest of Berkeley	Application with detailed FRA approved.
PS34	Sharpness Docks	91% zone 1 Overall, the site is at low risk of surface water flooding.

		<p>The site is at low to moderate risk of groundwater flooding</p> <p>- The application is awaiting approval with completion of s106 terms. It has been subject of a detailed FRA. This site passed a sequential and exception test in 2015 as part of the Last Local Plan.</p>
PS36	New settlement at Sharpness	<p>60% zone 1 - where 35% of land is in FZ 3a and 5% in FZ2 is at fluvial/tidal risk. The land at risk will primarily provide a nature reserve, green infrastructure and SANG areas.</p> <p>Surface water flood risk within the site is relatively low. The site is at low to moderate risk of groundwater flooding This was considered as acceptable in flood risk terms.</p>
PS37	New settlement at Wisloe	<p>99% zone 1 -</p> <p>The risk of surface water flood risk across the site is low. The site is at high risk of groundwater flooding. This was considered as acceptable in flood risk terms.</p>
PS43	Javelin Park	<p>98% zone 1 -</p> <p>The site is at high surface water flood risk, with runoff predicted to pond against the M5 motorway. The site has a low likelihood of groundwater emergence. This was considered as acceptable in flood risk terms.</p>
PS47	Land west of Renishaw New Mills	<p>96 % zone 1 fluvial flooding –</p> <p>Surface water flood risk to the site is relatively low. The site is at relatively low risk of groundwater flooding. This was considered as acceptable in flood risk terms.</p>
WHI007 / WHI011	Land north of Grove End Farm, Whitminster	<p>99% zone 1 -</p> <p>Areas of the site are at high risk of surface water flooding. The majority of the northern land parcel is identified as at low risk of groundwater flooding. The southern land parcel is identified as at moderate-to-high risk. This was considered as acceptable in flood risk terms.</p>

30. Overall, has the process robustly identified and assessed all relevant sites?

- 2.30.1 The Council considers that the SALA process has robustly identified and assessed all relevant sites.
- 2.30.2 The SALA 2016 considered potential land identified from a full range of available data sources together with specific sites promoted by landowners/ developers or other stakeholders. A call for sites formed part of public consultation at each stage of the Local Plan review, from Issues and Options 2017 through to

Additional Housing Options Consultation 2020, with new sites assessed and reported as an annual update to the SALA (EB19 – EB26).

- 2.30.3 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out in detail how the SALA process has robustly identified and assessed all relevant sites throughout the Local Plan review and provided a clear understanding of the land available to inform the identification, assessment and selection of sites for the Pre-submission Local Plan.

Appendix: Summary accessibility scores for strategic sites (data from EB112)

Policy	Allocation	SALA Reference	2017 Accessibility	2018 Accessibility Assessment	2019 Accessibility Assessment	2020 Accessibility Assessment
PS24	Cam North West	CAM013	65	89		71
PS25	Cam North East Extension	CAM018	84	83		66
G1	South of Hardwicke	HAR001	73	83		70
PS30	Hunts Grove Extension	HAR004	72	89		75
PS34	Sharpness Docks	NEW001	96	98		97
PS36	Sharpness New Settlement	NEW002	62	85		67
PS19a	Stonehouse North West	STO016	86	95		85
PS37	Wisloe New Settlement	SLI002/4/5 CAM0027 SLI006/7		90/89/95 89	96/70	67/76/81 74 79/67
G2	Land at Whaddon	BRO002	99	99		98

Sites considered at the Additional Housing Consultation Stage

PGP1	Land at Grove End Farm	WHI007 WHI014		91		80 78
PGP2	Moreton Valance / Hardwicke	HAR006/7/8/9 HAR015/16		90/96/85/96	96/96	76/89/83/89 85/87