



Stroud District Draft Local Plan Examination: Frequently Asked Questions

Stroud District Council (SDC) is currently at the **Examination in Public** (EiP) stage of its Local Plan preparation. These frequently asked questions help answer questions you may have about the plan, the process to date and where the process currently is.

- **Issues and options consultation Autumn 2017:** An opportunity to discuss emerging issues and identify ways of distributing and managing future development needs.
- **Emerging strategy consultation Winter 2018:** We now know the minimum number of houses that we need to provide for and we have identified a potential strategy for delivery.
- **Draft plan consultation Autumn 2019:** A chance to check that we have the right draft plan in place.
- **Additional housing options consultation 2020:** A focused consultation on some contingency spatial and site options
- **Pre-submission consultation Summer 2021:** The formal stages of making representations on the plan (Regulation 19). The 'Publication Draft Plan'.
- **Submission October 2021:** The Draft Local Plan (plus evidence base and all Reg.19 representations received) is submitted to The Secretary of State (Regulation 22) The 'Submission Draft Plan'.

Inspectors were appointed to **Examine** the Local Plan and scrutinise everything submitted, to ensure the plan is sound. Examination hearing sessions began in spring 2023.

- **Modifications:** There will be further consultation on any proposed modifications to the plan, arising out of the Examination process.
- **Adoption:** Once the Inspectors have confirmed the way forward, an adoption date will be provided.



◀ The Local Plan Review:

Following four years of preparation and then 'submission' to the Planning Inspectorate in 2021, the draft Local Plan is currently at the Examination in Public (EiP) stage.



Q1 What is the purpose of a Local Plan?

Local Plans, prepared by a local planning authority in consultation with its community, set out a vision and a framework for the future development of an area. Once in place, Local Plans become part of the statutory development plan.

The draft Local Plan currently at examination is available here:

https://www.stroud.gov.uk/info/Pre_sub.pdf

Q2 When did the Examination start?

SDC submitted its draft Local Plan to the Planning Inspectorate in October 2021. The Planning Inspectorate then appointed two independent Inspectors to lead the Examination. Hearing sessions, where members of the public could participate, started in March 2023.

Q3 Is the Examination still ongoing? Why have the hearing sessions stopped?

In March 2023 the Inspectors started holding hearing sessions to discuss various aspects of the draft Local Plan. In June 2023 the Inspectors called for a 'summer break'. During August, the Inspectors wrote to the Council setting out three main areas of concern regarding soundness. These three issues are:

- ▶ The Strategic Road Network (SRN), specifically the capacity of M5 Junctions 12 and 14
- ▶ Wisloe PS37 in relation to the provision of the pedestrian and cycle bridge over the motorway on grounds of viability and deliverability
- ▶ Sharpness PS36 regarding the provision of a passenger train service and bespoke Mobility as a Service transport scheme (MaaS) and concerns relating to the viability and deliverability of these schemes.

SDC responded to the Inspectors' letter requesting a six month pause allowing SDC and its partners to address the concerns raised.

The full letter setting out the Inspectors' concerns is available here:

<https://www.stroud.gov.uk/media/2236628/id-010-stroud-dlp-letter-from-inspectors-august-2023.pdf>

The full response from SDC is available here: https://www.stroud.gov.uk/media/2236778/sdc-letter-to-the-inspectors-29823_redacted.pdf



Q4 Have the Inspectors allowed the six month pause?

SDC has been working closely with its partners to address the issues raised by the Inspectors. There have been several communications between the relevant parties and all communications are available here: <https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/stroud-district-local-plan-review/local-plan-examination/examination-library>

Currently the Inspectors are still considering the six month pause and in order to assist their decision, they have requested National Highways, South Gloucestershire Council, Gloucestershire County

Council and SDC produce a Joint Action Plan setting out how and when the issues would be resolved.

The Inspectors' letter is available here: <https://www.stroud.gov.uk/media/2237057/id-013-stroud-dlp-letter-from-inspectors-24-october.pdf>

The Joint Action Plan is available here: <https://www.stroud.gov.uk/media/2237308/sdlp-joint-action-plan.pdf>

Q5 When will the Inspectors decide to allow a six month pause or not?

The latest letter from the Inspectors 18th December 2023, states: *'we welcome the progress that has been made with this work and are encouraged by the joint working that has taken place in producing it. The stages appear detailed and the timescale whilst remaining ambitious appears to be achievable.'* The letter also asked SDC to clarify some technical points in the Joint Action Plan. SDC has been given until 19th January 2023 to respond.

The Inspectors' latest letter is available here:

<https://www.stroud.gov.uk/media/2344935/id-014-stroud-dlp-letter-from-inspectors-18-december-2023.pdf>

Q6 When will the six month pause and the Joint Action Plan Start?

SDC has written the Joint Action Plan with its partners including National Highways, South Gloucestershire Council, Gloucestershire County Council. Until the Inspectors grant the six month pause, a lot of the work cannot be started for practical and cost reasons. However, all parties are committed to resolving the issues and are working together to deliver the draft Local Plan.



Q7 If the Examination in Public is paused, will the Evidence Base go out of date?

This is unlikely as the examination is based on information submitted at that point in time and paused during the examination. If there are external events which mean the evidence base is at risk of being out of date, the Inspectors may ask SDC to run an update or assess the evidence. SDC has already looked at this exercise and has not found any concerns with the evidence base now or in the event of a longer pause or delays.

Q8 Is the six month pause an opportunity to include new policies/make changes/or revisit parts of the draft Local Plan?

No, this is outside of SDCs control and is not how the examination works. The Inspectors have been clear, they are only considering the three areas of concern identified in their original 4th August 2023 letter.

Q9 Can I comment on the Joint Action Plan and the six month pause?

The draft Local Plan is currently at EiP, this process is in the control of the Government appointed Inspectors. They decide who can comment and when, they have currently stated:

We would like to inform all other interested parties that we are not, at this stage, inviting or accepting any other comments on this matter. Such responses will be immediately returned to the sender by the Programme Officer.

Any questions should be directed to the Programme Officer who works independently of SDC- Charlotte Glancy, bankssolutionsuk@gmail.com

Q10 What are the Inspectors concerns with the Strategic Road Network?

The Inspectors have raised concerns over M5 Junctions 12 & 14 in terms of capacity, viability and deliverability of potential mitigation schemes. This impacts a number of sites within the draft Local Plan. All of the communications and full details of the Inspectors concerns as well as SDC responses to date, are available in the Examination Library here:

<https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/stroud-district-local-plan-review/local-plan-examination/examination-library>



Q11 What is SDC doing to resolve these issues?

The Inspectors have recognised the Strategic Road Network is not an issue SDC can address on its own, as SDC is not a highways authority and is reliant on external partners to deliver the required improvements. SDC is working positively with its strategic partners to address the issues and has jointly produced an action plan to progress the required improvements. The Joint Action Plan is available here:

<https://www.stroud.gov.uk/media/2237308/sdlp-joint-action-plan.pdf>

Q12 M5 Junction 14 is not in Stroud District, why are we looking at Junction improvements there?

Stroud District is constrained by the Cotswolds National Landscape (CNL) (formally AONB), topography, flood risk and many other factors. This limits where new developments can be located. The draft Local Plan includes site allocations that have been assessed as the best location for developments, taking into account all factors. This is explained in EB4 Topic Paper - The Development Strategy October 2021 and the evidence base as a whole is available here:

https://www.stroud.gov.uk/media/1717016/eb4-topic-paper_the-development-strategy_october-2021.pdf

Unfortunately, infrastructure doesn't start and end at constitutional boundaries on a map. Stroud District is heavily reliant on the M5 and Junctions 12 & 14, which serve it in addition to Junction 13, which is not a concern for the Inspectors. SDC is unable to ignore infrastructure constraints that heavily impact the Stroud District due to them being in a neighbouring authority.

Q13 Is SDC going to lead on any potential Junction 14 improvements?

SDC is prepared to act as a lead on a number of tasks to assist in junction design and scoping with its partners, if required. SDC would try to resolve any infrastructure issues with its partners that impact the housing, economy, environmental and social health of the residents of Stroud District.

Q14 Have the Inspectors found other concerns with the draft Local Plan?

In February 2023 the Inspectors issued their Matters Issues and Questions (MIQs), which formed the basis of the follow-on hearing sessions. SDC and those who had submitted duly made consultation responses were invited by the Programme Officer to respond to the MIQs in



advance in order to assist the hearing sessions. The MIQs and all the submitted responses are available here:

<https://www.stroud.gov.uk/media/2084869/id-05-inspectors-matters-issues-questions.docx>

The MIQs give an understanding of what the Inspectors wished to discuss further on each site allocation or policy. The hearing sessions commenced in March and ran through to June 2023. During the hearing sessions, the Inspectors led the discussion and where they felt appropriate they discussed modifications required to make the plan sound. All of these modifications are available in the Examination Library here:

<https://www.stroud.gov.uk/media/2168804/list-of-modifications.pdf>

In the Inspectors letter 4th August 2023 which raised concerns over the allocations at Sharpness, Wisloe and the Strategic Road Network they also stated: *‘whilst we have a number of other soundness concerns with the Plan, we are confident that it is likely that these could be addressed by main modifications.’*

Q15 Will there be further modifications?

This is outside of the control of SDC. The Inspectors are tasked with making ‘main modifications’ in order to make the draft Local Plan ‘sound’ through the EiP. They have already set out a number of modifications, but they may make more modification as the EiP progresses. The modifications they have requested to date are available in the Examination Library here:

<https://www.stroud.gov.uk/media/2168804/list-of-modifications.pdf>

Q16 Can I comment on these modifications?

Once the EiP is complete, the Inspectors will publish all the modifications they believe are required to make the draft Local Plan ‘sound’. The Inspectors will then publish the modifications and request comments through a consultation. The parameters of that consultation including the date, timescales, how and when to respond will be set by the Inspectors and not SDC. It will be for the Inspectors to consider the comments received and consider if any changes are required.

Q17 Can I suggest a modification?

Not at this stage. The Inspectors have already held most of the hearing sessions, which cover the majority of the draft Local Plan. Future sessions will only focus on outstanding hearings sessions or issues the Inspectors have raised in their letters since June 2023.



Q18 Can the Council or my Councillor suggest a modification?

Not at this stage, unless they relate to an outstanding hearing session and they have already submitted a duly made written representation on the matter. This is not in the control of SDC and is led by the Inspectors.

Q19 What sessions are still to be held?

All sessions have now been held apart from:

- ▶ Matter 7a Housing supply
- ▶ Matter 7b Meeting specific housing needs
- ▶ Matter 7c Other housing policies
- ▶ Matter 8 Employment provision
- ▶ Matter 9 Retail provision and town centres
- ▶ Matter 12 Monitoring, viability and implementation

It is likely that the Inspectors will schedule additional hearings to cover the Strategic Road Network and any other issues arising from the Joint Action Plan or their letters since the summer break. This is outside of the control of SDC and will be at the discretion of the Inspectors.

Q20 Why don't we withdraw the draft Local Plan and start again?

The Inspectors have not currently asked SDC to withdraw the draft Local Plan or recommended that it be withdrawn. The Inspectors have raised three specific areas of concern, which SDC and its partners are working to resolve.

Withdrawing the draft Local Plan would result in SDC having to start again at significant cost and ultimately reaching the same stage of needing to resolve the Strategic Road Network M5 Junctions 12 & 14. This would also result in the Council having to defend a 5-year land supply, with SDC being exposed to the possibility of speculative development and the likelihood of inappropriate sites without the required joined up infrastructure coming forward. The lack of an up to date Local Plan would not mean no development, it would mean development outside of SDCs control.

The Government has been clear in the December 2023 Ministerial Statement and update of the National Planning Policy Framework, (NPPF), that all local authorities must have an up to date plan, otherwise “tough measures will bite”. Where local authorities do not have an up to date local plan, authorities will be required to update their housing supply annually, and if they fail to do so, will be “subject to the presumption in favour of sustainable development”. Recent



changes to the NPPF reward local authorities (LAs) at an advanced stage of plan making whereby those LAs with Local Plans at examination stage need only demonstrate a four-year housing land supply (as opposed to five years) for a period of two years from December 2023 for decision making purposes.

The Government has also recently intervened in a number of Examinations where local authorities, including where there has been a change in control following local elections, have tried to withdraw their Local Plan. Most recently in December 2023 the Minister of State for Housing, Planning and Building Safety, has written to West Berkshire Council to instruct the Council to progress with the Examination of the Local Plan, which was submitted to the Planning Inspectorate for examination in March 2023. The letter warns that further action will be taken unless the Council agrees to halt its current path of withdrawal. More interventionist action has been taken by the Minister of State for Housing, in the name of the Secretary of State, against Spelthorne BC and Erewash in similar circumstances. All three Councils were about to hold council meetings to consider withdrawing their draft local plans from examination.

The message from the Government is clear, that local authorities must work towards having up to date local plans. SDC adopted the current Local Plan in 2015 and since 2017 SDC has been positively preparing the new draft Local Plan, SDC is committed to working with the Inspectors to achieve the Government's requirement.

Q21 Can we demonstrate a five-year housing land supply for decision making purposes?

For the policies of the adopted Local Plan to be applied to planning applications for housing development, local planning authorities are normally required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against either the housing requirement set out in an up-to date adopted plan or against the local housing need calculated using the Standard Method where the plan is more than five years old.

The Council published its latest full assessment of housing land supply in November 2023, <https://www.stroud.gov.uk/media/2237273/five-year-land-supply-2023-final-29112023.pdf>. The report demonstrates 5.05 years deliverable housing land supply based on a five-year local housing need requirement calculated using the standard method and including a 5% buffer.

The Government has since published an update to the National Planning Policy Framework (NPPF), 19 December 2023, including the following changes to five-year housing land supply:

- removing the requirement for planning authorities with an up-to-date plan in place to update annually their five-year supply of land for housing;
- removing the 5% and 10% buffers applied to an authority's housing land supply;



- **rewarding local authorities (LAs) at an advanced stage of plan making whereby those LAs with Local Plans at examination, Regulation 18 or Regulation 19 stage need only demonstrate a four-year housing land supply** (as opposed to five years) for a period of two years for decision making purposes.

With the draft Local Plan currently at Examination, the Council has therefore published a housing land supply update which demonstrates a healthy 4.36 deliverable housing land supply based on a four-year local housing need requirement calculated using the standard method:

<https://www.stroud.gov.uk/media/2344996/housing-land-supply-update-january-2024.pdf>

Planning applications for housing development should therefore be determined in accordance with local policies for sustainable development as set out in the adopted Local Plan 2015 with some weight given to updated policies in the draft Local Plan currently subject to Examination.

Q22 Were there any other changes in the December 2023 NPPF we need to consider?

The draft Local Plan is in effect ‘paused’ at October 2021 when it was submitted to the Planning Inspectorate, and examined in respect of the legislation and guidance in place at the time. If there are any changes in the December 2023 NPPF the Inspectors wish SDC to consider, they will let us know.

Q23 I don’t remember there being consultation on the draft Local Plan, when did that happen?

The Local Plan review has included a number of informal stages of public consultation and a formal Regulation 19 consultation to engage local communities and stakeholders from the start of the plan making process. The first three stages of public consultation included public exhibitions around the District, meetings with town and parish councils, key stakeholders and hard to reach groups. The Additional Housing Options public consultation was undertaken online due to Covid-19 pandemic restrictions.

▼ **The consultation details are set out here:**

| | |
|---|---------------|
| Regulation 18, Issues and Options Consultation (8 weeks) | October 2017 |
| Emerging Strategy Consultation (9 weeks exceeded statutory period) | November 2018 |
| Draft Plan Consultation (9 weeks exceeded statutory period) | November 2019 |
| Additional Housing Options Consultation (8 weeks) | October 2020 |



| | |
|---|-------------------------------|
| Pre submission Draft Plan Regulation 19 & 20 Consultation (8 weeks) | May 2021 |
| Regulation 22, the draft Local Plan and all required Evidence Base submitted to the Planning Inspectorate | October 2021 |
| Additional Technical Evidence (4 weeks consultation period, set by the Inspectors) | September 2022 |
| The Inspectors Matters, Issues and Questions (MIQs) (8 weeks) | December 2022 – February 2023 |

Q24 What happened to all the comments submitted?

Reports from each of these initial consultation stages outlining the public consultation activities carried out, comments received and the Council’s response are set out in the Examination Library (CD4a – CD4e) available here: <https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/stroud-district-local-plan-review/local-plan-examination/examination-library>

These reports and comments were all submitted to the Inspectors who have considered these as part of the examination process.

Q25 I made comments but no changes were made to the draft Local Plan, why not?

Local plans are controversial as they contain large site allocations and new developments which impact people, places, infrastructure, and the environment. All local authorities are constrained by national regulations on how to produce a local plan, how many houses they must deliver and local constraints such as Cotswolds National Landscape (CNL) (formally AONB), topography and flood risk to name a few. The Council must produce a local plan working within these constraints and base its plan on a specified evidence base. The number, scale and location of sites are not always popular with the public, however local authorities have a requirement to provide new housing, employment and business opportunities for their districts. Comments received from the public rarely say where they would like new development to go and instead focus on where they don’t want it to be located.

While SDC has considered all comments received, it can only make changes based on appropriate evidence and not just objections or anecdotal statements. The Government appointed Inspectors must focus on the evidence submitted to support what is set out in a local plan, and they would not accept a local plan based on decisions made without appropriate supporting evidence.



Q26 Do we have to have a Local Plan?

Yes. The National Planning Policy Framework (NPPF) requires all local authorities to have an up to date adopted plan. If SDC doesn't have a local plan, it loses control of where and what type of developments can be located in the district.

Q27 Was the draft Local Plan debated and approved by Councillors?

Yes. Plan preparation is a democratic process. Councillors have been consulted throughout all stages of consultation (see question 23 on consultation for details). In order to comply with Government requirements, in September 2017 Environment Committee approved a timetable for the Local Plan Review and approved an Issues and Options paper for public consultation. In October 2018 Environment Committee approved an Emerging Strategy for further public consultation and in October 2019 Environment Committee approved a draft Local Plan for further public consultation. A final Additional Housing Options document was approved by Environment Committee in October 2020 for public consultation.

On 20th April 2021 Environment Committee resolved to recommend to Council the formal submission of the Pre-submission Draft Local Plan. This was followed on 29th April 2021 with Council resolving to approve the submission of the draft Local Plan to the Planning Inspectorate. The meeting on the 29th April was open to all Elected Members, included debate and a vote on the resolution.

Q28 My Parish/Town has a Neighbourhood Plan, does this stop new developments?

Neighbourhood Plans are not a vehicle to block or stop new developments, the Government is clear that any Neighbourhood Plans must be positively prepared and be pro-growth. The Government is also clear that Neighbourhood Plans must be in general conformity with Local Plans and must conform to all strategic local policies.

Any adopted (made) Neighbourhood Plans form part of the Development Plan for the District and are taken into account in the decision making process.

Q29 Will the Examination and work on the draft Local Plan stop for this year's local elections?

If the Inspectors grant the six month pause, the work on the Joint Action Plan would be considered 'normal council business' and would not fall under any restrictions of the pre-election



period. If agreed, the Joint Action Plan would run beyond the local pre-election and election periods until at least June 2024.

Q30 If the Inspectors agree the six month pause, when are the hearings likely start again?

This is at the discretion of the Inspectors and not SDC, however we would anticipate hearings commencing again in Autumn 2024.

Q31 When is the draft Local Plan now likely to be adopted?

SDC is making progress with the issues identified by the Inspectors and if a six month pause is granted, SDC anticipates the plan could be adopted in 2025. This would be following a public consultation on any proposed modifications at the direction of the Inspectors and the decision to adopt would be taken by full Council.

Q32 I am not happy with a topic/issue that has already been discussed, will I be able to comment again?

It is unlikely you will be able to comment again if the hearing session has already been held. If a modification is made to a particular site or policy the Inspectors will hold a consultation and you will be able to submit comments. Please see questions 14-17 on modifications above.

Q33 Why am I not notified when the website/ Examination Library is updated?

This is not in the control of SDC: the Examination website and Examination Library is updated on the instruction of the Inspectors; and they specify to the Programme Officer who should be notified and when documents can be published on the website. While the website is hosted on the Council webpages, the content is controlled by the Inspectors and Programme Officer.

Q34 What can I do if I am not happy with the Examination in Public or I have a query?

The Examination is being led by the Inspectors and administrated by the independent Programme Officer. This is not within the control of SDC and you need to speak to the Programme Officer Charlotte Glancy, bankssolutionsuk@gmail.com .



Other Questions

These questions have been received by members of the public and include questions submitted by the MP for Stroud, SDC will add to this list as appropriate.

a. What discussions are taking place with the Inspectors and what is the up to date position regarding SDC's request to 'pause' the emerging Local Plan?

Please see answers to Questions 3, 4 and 5 above.

b. When will a final decision be made about the recommendation to withdraw the Plan?

The Inspectors have not recommended the draft Local Plan is withdrawn and are currently considering SDC's request for a pause to address the concerns they have with the Strategic Road Network (SRN). Please also see answers to Questions 3, 4 and 5 above.

c. What is your assessment of how next year's council elections and the purdah period will impact the work required to create a Local Plan?

If the Inspectors grant the pause, the work on the Joint Action Plan would be considered 'normal council business' and would not fall under any restrictions of the pre-election period. If agreed, the Joint Action Plan would run beyond the pre-election and election periods until at least August 2024.

d. The existing Local plan runs until 2031. What assessment has the council made in terms of the current land supply and how have you calculated this?

The Stroud District Local Plan was adopted in November 2015 with a housing requirement figure of 11,400 new homes (2006 – 2031), equating to an annual requirement of 456 dwellings.

The NPPF requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need calculated using the standard method where the strategic policies are more than five years old.



SDC published its latest assessment of housing land supply in November 2023,

<https://www.stroud.gov.uk/media/2237273/five-year-land-supply-2023-final-29112023.pdf>. The report demonstrates 5.05 years deliverable housing land supply based on a five-year local housing need requirement calculated using the standard method and including a 5% buffer.

The Government has since published an update to the National Planning Policy Framework (NPPF), 19 December 2023. With the draft Local Plan at an advanced stage of plan making, SDC now need only demonstrate a four-year housing land supply (as opposed to five years) for decision making purposes. The requirement to add a 5% buffer has also been removed.

SDC has published an updated assessment of housing land supply demonstrating 4.36 years deliverable housing land supply against a four-year housing need requirement calculated using the standard method, <https://www.stroud.gov.uk/media/2344996/housing-land-supply-update-january-2024.pdf> in accordance with the new NPPF.

e. We are told that in addition to firm commitments of 4595 homes allocated in the existing Local Plan, SDC were proposing to build another 10340 homes. This is more than a 29% uplift on the minimum 8005 required to meet housing need over the plan period. I have worked hard with my colleagues in parliament to limit top down imposed targets and, whilst I acknowledge some margin on this legacy number might be required, this seems excessive and is significantly over the existing national housing targets. What is the current target and details of how the existing emerging Local Plan meets this and exceeds the same?

This is incorrect. The total housing supply set out in the Plan of 10,340 homes includes 4,595 commitments with planning permission as explained below:

[Table 2 of the Local Plan subject to Examination](#) sets out the calculation of the residual housing requirement to meet a local housing need of 12,600 dwellings over the Plan period 2020 – 2040 based on an annual local housing need of 630 dwellings, a 40% increase from the figure in the adopted Local Plan of 456 dwellings a year. Taking into account 4,595 deliverable commitments with planning permission or a resolution to grant permission, as at April 2020, results in a minimum residual housing requirement of 8,005 dwellings to 2040. The Plan allocates 9,065



dwellings across a range of strategic and local sites to meet this residual requirement. An additional small sites allowance is set out from year 4 onwards, in accordance with historic windfall delivery rates and expected future trends, resulting in an anticipated total housing supply of 10,340 homes.

[Table 2 has since been updated in the Examination Library](#), as part of SDC’s response to the Inspectors’ Matters, Issues and Questions (MIQs): Matter 7 Housing Provision, to reflect housing completions April 2020 – March 2022 and deliverable commitments with planning permission or a resolution to grant permission, as at April 2022. The updated table identifies a minimum residual housing requirement of 7,855 dwellings to be met across the planned range of strategic and local site allocations delivering 9,065 dwellings and a total housing supply over the Plan period 2020 – 2040 of 10,190 dwellings from completions, commitments, Local Plan allocations and small sites windfall.

A further update to Table 2 is included at the end of these questions, setting out the latest calculation of the residual housing requirement based on data for housing completions, commitments and deliverable housing supply at April 2023, alongside earlier versions of the table referred to above.

The total housing supply identified in the Plan is considered necessary to provide a sufficient supply of deliverable commitments throughout the Plan period and the necessary headroom to deliver the required significant boost in the supply of homes to meet housing needs, including affordable housing, and address wider long term affordability issues.

SDC’s response to the Local Plan Inspectors’ Matters, Issues and Questions (MIQs), Matter 3 Housing need and requirement, [Here](#), was considered by the Inspectors at the Local Plan Examination hearing session on 7 March 2023. No modifications have been suggested and no issues of soundness have been raised by the Inspectors in their initial response to the hearing sessions.

Matter 7, including Matter 7a Housing supply, [Here](#), is still to be considered by the Inspectors.

f. What assessment has the council done of proposed planning law reforms in Parliament, particularly in relation to house building targets and how this affects the Stroud District?

SDC supports a Plan led system to deliver the types and quality of homes that communities need in the right places supported by adequate local infrastructure provision. SDC welcomes the latest NPPF changes removing the requirement for local planning authorities (LPAs) with an up to date Local Plan to identify and update annually a five-year deliverable housing land supply and incentivising Local Plan adoption by only needing to demonstrate a four-years deliverable



housing supply where plan making has reached an advanced stage. The removal of the need to add a 5% buffer to the calculation of housing land supply is also welcomed.

Future measures to allow any oversupply early in the plan period to be taken into consideration when calculating a 5YHLS later would also be supported. Housing delivery in Stroud District has to date been in excess of the 630 annual housing requirement for each of the first three years of the draft plan period to April 2023, delivering 2,148 dwellings against a Local Plan housing requirement of 1,890 dwellings, an oversupply of 258 dwellings.

g. Will SDC provide written confirmation that Neighbourhood Development Plans will now be taken into account and followed? This work takes many years and are very specific about the shaping of neighbourhoods and local density levels to retain “character”.

Please see answer to Q28 above.

h. Local people have indicated their shock that SDC did not identify the significant funding required for two motorway junctions critical to the plan SDC have constructed. What discussions have taken place with South Gloucestershire Council (SGC) and Gloucestershire County Council (GCC) about M5 junctions 12 and 14 and has any funding now been secured?

The Inspectors requested SDC, South Gloucestershire Council, Gloucestershire County Council and National Highways work together to produce a Joint Action Plan to address and resolve the issues identified at M5 J12 and J14. The Joint Action Plan is a result of all parties working together and sets out what work is required and when it will be undertaken. To address the funding issues, the Joint Action Plan agreed by all parties includes the following tasks:

- Interim year modelling of updated housing trajectory and threshold / trigger point testing
- Agree most appropriate source of public funding for each scheme
- Apportion costs based on mathematically robust method included within Funding and Delivery Plan
- Define and agree sensitivity test methodologies for apportionment exercises



- Undertake sensitivity testing exercises to determine the range of potential apportionment percentages

Stroud is not the only district to have issues with the Strategic Road Network and like others, is reliant on statutory partners responsible for the highway network as recognised by the Inspectors. This is being addressed through the collaborative working and the Joint Action Plan. SDC and NH are working with the Department for Levelling Up, Housing and Communities (DLUC) and the Department for Transport (DFT) regarding future funding sources.

i. Motorway junction improvements of the type required at M5 J12 and J14 are costed at between £300 and £400 million each. Is it realistic, reasonable, practical or sensible to base your plan on public funding of this scale for two junctions within a short distance of each other?

Stroud District is constrained in planning terms. The west of the district is constrained by flood risk and the east of the district is constrained by the Cotswold National Landscape Area (AONB). The A38/ motorway and rail corridor is a focus for development around existing strategic communication infrastructure and in planning terms is relatively unconstrained land. Future sustainable development will be likely to have an impact on this key transport corridor resulting in a number of improvements to be made to accommodate the proposed growth. This will be repeated for those local authorities north and south of Stroud as their plans progress.

SDC can't ignore difficult challenges, M5 Junctions 12 and 14 are an issue now and will continue to impact the residents of Stroud. SDC, National Highways, South Gloucestershire Council, Gloucestershire County Council and the Inspectors all recognise the best way to deal with the issues is to progress a sound local plan.

j. M5 Junction 14 is outside the Stroud District and does not form part of SGC's 'Towards an Emerging Local Plan'. Is it realistic or within the capacity of SDC to continue promoting an infrastructure project of this scale beyond the borders of the district?

SDC, National Highways and Gloucestershire County Council have been working with South Gloucestershire Council since the inception of the emerging Local Plan. As a consequence of recent discussions SDC is prepared to act as the scheme sponsor role for M5 J14 in the initial phase if required to do so. This could include initial technical work required on concept design



development, as well as future junction costing, any apportionment exercise including investigating/securing the wider sources of funding.

The role of SDC would be limited to these initial tasks as SDC is not a highway authority and National Highways recognise they would be the statutory body to deliver the junction works. South Gloucestershire Council are engaged with the Joint Action Plan which proposes SDC is prepared to act as scheme sponsor in the initial stages.

As discussed in Question i, Stroud District is constrained in planning terms and is required by the Government local plan regulations to test all appropriate scenarios for delivering housing, jobs and environmental sustainability. The draft Local Plan evidence base supports the distribution of growth included in the draft plan. SDC is unable to ignore difficult infrastructure challenges when solutions with strategic partners may be available.

k. SGC debated and voted to go to consultation this week on Regulation 18 ‘Towards an Emerging Strategy’ of their Local Plan. The responsible Cabinet Member made it very clear that developing in the north of their district (around M5 Junction 14) was not supported due to the hugely damaging impact of ‘cross Green Belt’ commuting this would bring regardless of additional sustainable transport introduced. As SGC are clearly not supportive of developing in the environs of M5 Junction 14 is it realistic, practical, sensible or ethical for SDC to continue pursuing this strategy?

SDC have not yet responded to the South Gloucestershire Council Regulation 18 consultation, therefore it is not appropriate to comment on the distribution proposals of that plan here. However, the South Gloucestershire Council proposals are currently at a very early stage and have not yet been fully tested through evidence base work, consultation response analysis or statutory bodies assessments such as National Highways, SDC or the other relevant duty to cooperate bodies. It is possible that the South Gloucestershire Council approach may change.

SDC has a responsibility to its communities to deliver the housing, jobs, infrastructure and important environmental policies and protections our communities need. This includes investigating solutions to difficult issues, regardless of the progress with the current draft Local Plan, the capacity issues at M5 J14 will continue to cause issues for Stroud District and stifle economic prosperity and growth if the issues are not addressed.



SDC, National Highways and South Gloucestershire Council recognise at M5 Junction 14 that there are peak flow capacity issues. Progression of a local plan can enable these matters to be modelled and solutions identified.

l. SGC stated this week during the debate on Regulation 18 ‘Towards an Emerging Strategy’ of their Local Plan that they have removed ‘wishful thinking’ public infrastructure investment contained in the previous iteration of their plan. Wouldn’t SDC be wise to consider a similar option particularly for infrastructure beyond the district?

It would not be appropriate for SDC to comment on infrastructure projects that don’t impact the Stroud District. However, M5 J14 has a clear impact on Stroud housing, jobs, economic, social and environmental prosperity. While large infrastructure projects are challenging, SDC has a responsibility to its communities to understand and address these issues. The progression of the draft Local Plan is the best mechanism to address these issues.

m. What other transport infrastructure proposals are being considered?

At this stage the Inspectors have only asked SDC to consider the Strategic Road Network at M5 J12 and J14, SDC has worked with National Highways, South Gloucestershire Council and Gloucestershire County Council to produce the Joint Action Plan to address the Inspectors concerns. The remaining transport infrastructure requirements are set out in the Infrastructure Delivery Plan EB69, EB110 in the Examination Library and the Sustainable Transport Strategy EB60a,b,c. in the Examination Library. The Inspectors have already held hearing sessions on infrastructure and have not raised any concerns at this time other than the Strategic Road Network M5 Junctions 12 and 14.

n. GCC Highways suggested during the EiP that they believed the whole SDC Local Plan strategy was wrong and that it should have been based on existing infrastructure with capacity. Has work to identify this capacity and how it could inform a revised plan been undertaken?



At this stage SDC are not proposing a revised plan and has not been asked to do so. In their letter (24th October) the Inspectors invited National Highways, Gloucestershire County Council and South Gloucestershire Council to comment on the Technical Note submitted by SDC (housing in our Local Plan which can be delivered without having an impact on M5 J12 or J14, 16 October 2023). As part of the joint working to resolve the Inspectors concerns with the Strategic Road Network discussions with GCC and NH identified that it is appropriate to verify the work undertaken. This will support the trajectory set out in Appendix 2AC6 by reference to traffic modelling for an interim year. This modelling will reinforce the work already undertaken. SDC has worked collaboratively with National Highways to agree the parameters for these further interim year assessments. The further modelling work will be led by National Highways and is included within the agreed Joint Action Plan. This will occur alongside other tasks and can be delivered well within the timeframe of the Joint Action Plan.

o. I understand that the lead planning officer for the Local Plan, Mark Russell, has decided to take early retirement. How will his departure affect the work? Will there need to be recruitment for his role?

Following the planned retirement of the Head of Service, responses to questions raised by our Local Plan Inspectors are being co-ordinated by a highly experienced and senior interim manager. The interim manager has played a leading role at all stages of our Local Plan work over the past 2 years, including the examination process, and is working effectively with the relevant partners to ensure that the inspectors' questions are addressed by the deadlines set.

A recruitment exercise to replace the Head of Service post on a permanent basis has commenced in early 2024 and we aim to fill the post in spring 2024.

p. Assuming the plan is withdrawn we are told that SDC will look at sites previously excluded. When would a decision be made about new sites in those circumstances?

If the draft Local Plan is withdrawn, the SDC would need to start a new plan under the Government's new planning proposals. The Government is currently considering the responses to the recent Local Plan consultation. Any future plan would have to follow the new legislation which would set out the required stages. As these details have not yet been released by the Government, the SDC is not in a position to comment.



q. Which sites could be considered for a new emerging Local Plan and when will such areas be consulted?

A new Local Plan would have to consider and test any site submitted through a call for sites process. This would likely include all sites in the current draft Local Plan, all sites which were rejected and not included in the current draft Local Plan and any new sites that are submitted. As discussed above, the Government have not yet confirmed the new system including how/when consultation would need to be undertaken.

r. What format will the consultation take?

Future consultations would have to follow the regulations at that time. Please see answer to Question p.

s. I think it will assist local people to receive examples of where the draft 2021 Local Plan Review was changed following consultation with residents in the various iterations from 2017 onwards. I understand this has been requested by Cllr Stephen Davies. Would you kindly share this information with me.

Please see answers to Questions 23, 24 and 25.

t. Is there now an opportunity to include new environmental measures and protections in a Local Plan? I am thinking about Swift Bricks which I identified some time ago were missing from SDC.

The draft Local Plan is still at the formal Examination stage, where only the Inspectors can request or suggest modifications to the plan. Please see answers to Question 17 and 18.

u. Will employment sites be reviewed? The ratio of housing to employment has long been in dispute for some areas.



The draft Local Plan is still at the formal Examination stage, where only the Inspectors can request or suggest modifications to the plan. If the Inspectors continue the Examination hearings sessions, Matter 8 Employment provision is still to be discussed.

v. What other aspects of the emerging Local Plan's infrastructure proposals be reviewed? i.e. schools, GP surgeries, childcare etc.

As part of the Local Plan evidence base, SDC is required to work with all statutory Infrastructure providers who assess the infrastructure requirements as a result of development in the Local Plan. This information has to be provided in an Infrastructure Delivery Plan and forms part of the Examination process by the Inspectors. The hearing sessions on infrastructure have already been held. The Inspectors have not raised infrastructure concerns (other than the Strategic Road Network) and have not requested any amendments to the draft Local Plan. The infrastructure requirements in the draft Local Plan come from the statutory bodies themselves, so schools and GP provision is provided by the relevant bodies in line with Government requirements, standards and funding.



Question e, Table 2:

| Table 2: Local Plan housing requirement to 2040 | | April 2020 | April 2022 | April 2023 |
|---|---|---------------|---------------|---------------|
| Supply | Completions since April 2020 | 0 | 1,516 | 2,148 |
| | A Large sites commitments (on sites with permission / under construction) | 4,606 | 3,174 | 2,856 |
| | B Small sites commitments (on sites with permission / under construction) | 525 | 418 | 398 |
| | C Other firm commitments (on sites subject to resolutions to grant permission) | 84 | 42 | 0 |
| | D Total commitments (= A + B + C) | 5,215 | 3,634 | 3,254 |
| | E Commitments (D) minus undeliverable sites | 4,595 | 3,229 | 3,015 |
| | Total supply (= Completions + E) | 4,595 | 4,745 | 5,163 |
| Requirement | F Housing needs 1 April 2020 to 31 March 2040 (= 630 pa x 20 years) | 12,600 | 12,600 | 12,600 |
| | G Minimum residual housing requirement to 2040 (= F – total supply) | 8,005 | 7,855 | 7,437 |
| Allocated sites in Local Plan | | 9,065 | 9,065 | *8,995 |
| Small sites allowance (75pa excluding Y1 – Y3) | | 1,275 | 1,125 | 1,050 |
| Total housing supply in Local Plan | | 10,340 | 10,190 | 10,045 |

**Excluding PS33 110 dwellings, granted planning permission June 2022 for 107 dwellings included in large site commitments with planning permission*



Stroud District Council
Ebley Mill
Stroud
Gloucestershire
GL5 4UB

The Planning Strategy Team
local.plan@stroud.gov.uk

visit www.stroud.gov.uk/localplanreview

