

Stroud District Local Plan Review

Topic Paper: Assessment and
selection of sites

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Introduction

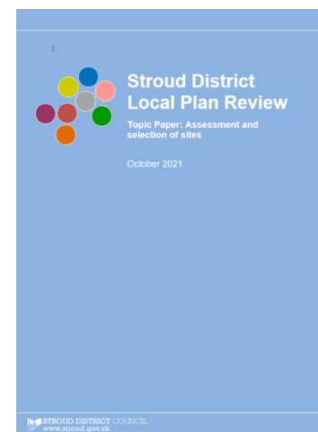
This topic paper is one of a series of papers supporting Stroud District Council’s **Draft Local Plan** (The ‘**Submission Plan**’), which has been submitted to the Secretary of State for examination by the Planning Inspectorate. The topic papers provide a summary of the evidence base and how it has been used to shape the draft plan. They also highlight relevant national and local guidance where necessary, to explain how the various plan-making requirements have been addressed and have impacted on the emerging plan.

The topic papers do not contain any policies, proposals, site allocations or new evidence and they should be seen as explanatory supporting documents.

- **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.
- **Final 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 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 Plan’.

An Inspector will be appointed to **Examine** the Local Plan and scrutinise everything submitted, to ensure the plan is sound.

- **Modifications:** There will be further consultation on any proposed modifications to the plan, arising out of the Examination process.
- **Adoption:** It is anticipated that the new Local Plan will be adopted by Winter 22



◀ The Local Plan Review:

Topic Papers have been produced to support the Draft Local Plan through submission and examination: to summarise and direct the Inspector to relevant parts of the existing evidence base, and to explain the plan-making process in relation to a small number of topics.



Topic Paper: Assessment and selection of sites

This topic paper focusses on the site selection process. The Draft Local Plan allocates 34 sites, which enables the Council to demonstrate how it is positively meeting its identified future housing and employment needs. Additionally, one site is safeguarded to help meet Gloucester City's future housing needs, should it be required. This topic paper sets out the Council's approach to identifying and assessing potential sites and selecting suitable sites to meet these requirements.

This topic paper seeks to highlight the key factors the Council has weighed in the balance, in terms of site selection. It also seeks to demonstrate that the Draft Local Plan has been based on the most up-to-date evidence throughout its preparation, which has been made available for consultation where appropriate. Relevant documents that informed the approach to site selection have been identified; and their headline findings are summarised, in so far as they justify the Council's approach.



1. Stroud District Council's approach to the assessment and selection of potential sites

National policy context

- 1.1 The **National Planning Policy Framework** (NPPF) requires local plans to allocate sufficient land in appropriate locations to ensure that there is an adequate supply to address objectively assessed needs over the plan period. Paragraph 23 of the NPPF states that local planning authorities have a role in *“planning for and allocating sufficient sites to deliver the strategic priorities of the area”* and paragraph 68 sets out that strategic policy-making authorities *“should have a clear understanding of the land available in their areas through the preparation of a strategic housing land availability assessment”*. Paragraph 35 of the NPPF requires local plans to be justified and provide *“an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”*. The consideration of reasonable alternatives, and how sites perform against each other, is therefore a key test for the site selection process.
- 1.2 **National Planning Practice Guidance** provides further guidance regarding the preparation of housing and economic land availability assessments which are an important source of evidence to inform plan making and decision taking as they identify a future supply of land which is suitable, available and achievable for housing and economic development over the plan period. Whilst the land availability assessment does not in itself determine whether a site should be allocated for development, it provides information on the range of sites to meet the local authority's needs. It is the role of local plans to determine which of those sites are the most suitable, having regard to other evidence and the spatial strategy.
- 1.3 This topic paper explains how the District Council developed its housing and economic land availability assessments and how these and other assessment activities have informed the identification, assessment and selection of sites for the **Pre-submission Draft Local Plan**.

The Stroud District Local Plan Review

- 1.4 The development strategy set out within the **Pre-Submission Draft Plan** (May 2021) is based primarily upon the principle of concentrated growth at a selection of strategic urban extensions, new settlements and commercial market areas, but with some dispersal to ensure local needs can be met and settlements can respond to wider economic and demographic challenges. It takes forward the main pillars of the 2018 Emerging Strategy, refined through the Draft Plan consultation of winter 2019/20, and seeks to distribute at least 12,600 additional dwellings and sufficient new employment land to meet needs for the next 20 years.



- 1.5 Taking account of environmental constraints, sustainability objectives and the availability and deliverability of land surrounding the district's settlements, sites for future growth in accordance with this strategy are identified for allocation at a targeted selection of settlements within the top tiers of Stroud District's settlement hierarchy (as defined in the plan's Core Policy CP3):
- Tier 1 main towns: Cam & Dursley, Stonehouse, Stroud
 - Tier 2 local service centres: Berkeley, Minchinhampton, Nailsworth and Painswick; plus additional expansion of the emerging new Tier 2 settlement of Hunts Grove; and a new planned Tier 2 settlement at Sharpness.
 - Tier 3a villages: Brimscombe & Thrupp, Leonard Stanley, Frampton-on-Severn, Whitminster, Hardwicke and Kingswood; and a new planned Tier 3a settlement at Wisloe.
- 1.6 In addition, the **Pre-Submission Draft Plan** includes one strategic site allocation at Whaddon, which safeguards land to meet the future needs of Gloucester City, should it be required, and provided it is consistent with a future approved strategy of the Joint Core Strategy Review.
- 1.7 Stroud District Council has followed a process of identifying, assessing and selecting potential land for development, which has introduced and then filtered out sites during the course of the Local Plan Review. This has progressed from the objective and 'policy off' appraisal of potentially suitable and available sites (through the **Strategic Assessment of Land Availability**) towards a more strategy-led selection of the best-performing sites, at appropriate locations and of appropriate scale to deliver the envisaged strategy and to achieve strategic objectives for the district as a whole.
- 1.8 **Part 2** of this topic paper sets out the chronology of this process and provides direction to relevant evidence base documents.

2. Site assessment and selection timeline

2.0.1 It is useful to read the following timeline in parallel with the **Development Strategy Topic Paper**, which explains when and why the search for suitable sites was either narrowed down to particular broad locations / settlements or was opened out to additional / alternative options. The ‘filtration’ of sites into and out of the emerging plan’s cache of potential land for allocation ran in tandem with the evolution of an overall growth strategy. This helps to explain why some sites, broad locations and settlements that may have been ‘rejected’ or discounted as suitable for development at an early stage of the plan were subsequently (re)introduced at a later point. The logic was rooted in the emerging strategy, which was informed at all stages of the plan-making process by evidence about the district’s growth needs, development opportunities and constraints. This evidence was gathered, refined and refreshed throughout the Local Plan Review.

2.1 Strategic Assessment of Land Availability (SALA) 2017

2.1.1 Identification of sites and broad locations

Public consultation on a proposed revised methodology for Stroud District’s **Strategic Assessment of Land Availability (SALA)** was accompanied by a **call for sites** (open between 7th December 2015 - 18th January 2016). During this period, a total of **136** sites were promoted. A finalised **Strategic Assessment of Land Availability (SALA) Methodology**, for the 2016 SALA and subsequent updates, was published in February 2016.

→ Sites in

SALA ‘call for sites’ 2015/16: **136** sites submitted.

2.1.2 Having regard to the types of site and potential data sources set out in the national PPG¹ (and summarised in Appendix B of the **Methodology**), including previous housing land supply studies and the Brownfield Register, Council officers carried out a **desk-top review of sites and broad locations** for development in and around the District’s settlements, to identify additional potential land that might be capable of delivering five or more dwellings, or economic development, other residential development, retail or community uses on sites of 0.25ha (or 500m² of floor space) and above.

→ Sites in

SALA desktop review 2016

2.1.3 SALA 2017: Site assessment

The 2017 SALA assessment considered specific identified brownfield and greenfield sites promoted by landowners/developers through the **call for sites** process, together with a reassessment of sites identified via the **desk-top review**:

Sites carried forward



39 sites identified as being deliverable and/or developable

¹ Housing and economic land availability assessment. Paragraph: 011 Reference ID: 3-011-20190722

- **302** sites were included within the 2017 SALA.
- Of these, **47** sites were excluded from the SALA assessment for various reasons (refer to **Appendix 4** of the **2017 SALA Report of Findings**).
- The remaining **255** were subject to site assessment and were visited by Officers during August and September 2016.

All **255** sites were assessed for their suitability for development, their availability and achievability, in accordance with the published **Methodology**². Including assessment of:

- physical constraints (including access, flood risk, topographical constraints and land contamination)
- access to facilities and services
- potential development impacts on the District’s natural and historic environment, in terms of landscape, heritage and biodiversity interests.

2.1.4 The suitability assessment was informed by:

- **Stroud District Landscape Sensitivity Assessment** (December 2016³)
- **SALA Heritage Impact Appraisal** (May 2017)
- Desktop flood risk assessment, using mapped data.
- Desktop ecology / biodiversity assessment, using mapped data from the Gloucestershire Centre for Environmental Records (GCER)
- **SALA Transport Accessibility Assessment** (May 2017).

2.1.5 The **Stroud District Landscape Sensitivity Assessment** (the Landscape Assessment) was commissioned to support the 2017 SALA. The study looked at landscape parcels (LPs) adjacent to the District’s main settlements*, in order to produce a summary of each settlement's landscape sensitivity and to identify whether there is a preferred direction for future growth, should it be needed, in landscape terms. The focus of the **Landscape Assessment** is on land directly around each settlement – including those sites that were identified for assessment in the SALA study. However, the land parcels identified for study were defined by the character of the landscape and settlement edge, not necessarily by the SALA site boundaries. Hence it was possible for some SALA sites to straddle land parcels, and for parts of sites to be identified at having greater landscape sensitivity than others. The findings of this study are summarised within the ‘Suitability’ section of each site

*under the **current** Local Plan policy framework.*

*A further **62** SALA sites were identified as having some future development potential, subject to a change of strategic / policy framework. These sites were earmarked for consideration through the Local Plan Review.*

← Sites out

Some sites (or parts of sites) were filtered out, if assessed as unsuitable due to constraints or potential impacts.

Very small sites (fewer than 5 dwellings) were not considered to have allocation potential: sites with development potential below this threshold were not fully assessed at this stage.

Sites lying beyond the periphery of Tiers 1, 2 and 3 settlements and those in remote rural locations were not fully assessed at this stage.*

² The approved SALA Methodology states that the SALA output will “contain more detail for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons”. Hence, the final SALA Report of Findings contains fuller assessment detail for those sites considered to have “future potential” or to be currently deliverable/developable.

³ Although the publication date is December 2016, the study’s draft findings were available to inform Officers’ suitability assessments during late summer and autumn 2016.

* These are the settlements in Tiers 1-3 of the 2015 (current) CP3 settlement hierarchy in the adopted Local Plan.



assessment in the final **2017 SALA Report of Findings**.

- 2.1.6 The **SALA Heritage Impact Appraisal 2017 (HIA)** was produced to inform the assessment of potential development impacts – both positive and negative – on the historic environment and heritage assets. The findings of this study are summarised within the ‘Suitability’ section of each site assessment in the final **2017 SALA Report of Findings**. In total, 112 sites were identified as having some degree of heritage sensitivity, where the potential impacts of development required assessment. The **HIA** methodology is outlined in the document introduction.
- 2.1.7 A desktop ecology, biodiversity and geodiversity assessment, used mapped data from the **Gloucestershire Centre for Environmental Records (GCER)** to identify sites lying within, partly within or adjoining any international, national or locally designated sites, and to flag probable presence of species or geological features that are subject to special protection. The findings of this desktop review are summarised within the ‘Suitability’ section of each site assessment in the final **2017 SALA Report of Findings**.
- 2.1.8 The 2017 **SALA Transport Accessibility Assessment** used data from the **Inform Gloucestershire (Gloucestershire County Council) 2016 “Accessibility Matrix”**, which is based upon average drive-time and walking/public transport journey times to key services and facilities across the county. For the purposes of the 2017 SALA, the **Matrix** was used to calculate average theoretical journey times⁴ from each SALA site’s centroid point to the nearest (or most quickly accessible) town centre and to 13 key services and facilities, which were used as indicators for ease of access to employment, education, healthcare, leisure, retail and strategic transport infrastructure (see **APPENDIX 1** for a summary of the assessment criteria). Individual journey times were aggregated into an overall accessibility ‘score’ for each site, which appears in the ‘Suitability’ section of each site assessment in the final **2017 SALA Report of Findings**.
- 2.1.9 This ‘score’ is useful as a broad indicator of current accessibility, allowing some degree of objective comparison between all the SALA sites. But the accessibility scoring did not take account of potential for transport improvements, including any that might be delivered through development itself⁵. However, Officers were able to reference broader accessibility factors in the ‘Suitability’ summary, including features, obstacles or opportunities

⁴ Travel times do not take account of variable traffic conditions, but do rely upon genuine bus timetables (as at 2016) and safe /realistic walking routes.

⁵ Scope for accessibility enhancements and transport infrastructure requirements were addressed later in the Local Plan Review, including through the High Level Transport Assessment in 2018 (see section 2.3, below) and traffic modelling in 2021 (see 2.5).



observed during site visits.

2.1.10 Whilst the **SALA Transport Accessibility Assessment** was not separately published, the scoring, the assessment criteria and the data was subsequently supplied to the Council’s **Sustainability Appraisal** consultants (LUC) and incorporated into the SA of potential site options (see section 2.3 below, and onwards). The **SA Report for the Pre-submission Draft Local Plan** (May 2021) includes details of how the **SALA Transport Accessibility Assessment** was undertaken and applied to the appraisal of site options in the SA work in Chapter 2 and Appendix 4.

2.1.11 The final **2017 SALA Report of Findings** (May 2017) identifies:

- i) **deliverable and developable sites** (based on current policy framework / the 2015 Local Plan): a total of **39 sites** were identified as having potential for additional housing at the most sustainable settlements. Those that could be delivered within the next 5 years were identified as deliverable; and those likely to be developed beyond 5 years were identified as developable, in accordance with national definitions. The 2017 Report’s **Appendix 2** sets out the results for each of these 39 sites.
- ii) **sites with future potential** (depending on what a future development strategy and policy framework might consist of): whilst not currently deliverable, **62 SALA sites** were considered to have future potential to contribute towards a theoretical land supply in the future, under a different strategic framework. These sites are not in accordance with the current adopted (2015) **Local Plan** strategy and are therefore inappropriate for development at the current time. However, those considered most suitable for future development were earmarked for consideration through the Local Plan Review. The 2017 Report’s **Appendix 3** sets out the results for each of these 62 sites.



2017 SALA Report of Findings

Appendices set out the results for each of the 255 sites assessed, with more detailed summaries for sites with future potential and those that are developable / deliverable.

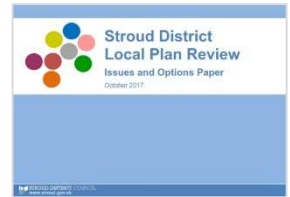
2.1.12 In March 2017, officers convened a meeting of a SALA Panel, to ‘health check’ the SALA process and outputs. The Panel comprised a range of representatives from the development and property industry who were invited to discuss the deliverability and developability of a potential sites included in the SALA, for housing, economic and community development, to provide a wider understanding of the current general market position regarding likely developability and future demand across the District. Panel members were sent a sample of assessed sites in advance, as an indication of the range of sites and type of development included in the SALA. At the meeting, the panel discussed the Council’s general approach to deliverability, as demonstrated by the sample sites.



2.2 Local Plan Review: Issues and Options stage 2017-2018

2.2.1 Consultation on potential sites and broad locations

The Local Plan Review was formally launched in October 2017, with the publication of an **Issues and Options Paper** and a public consultation that ran until 5th December 2017. The paper set out some emerging issues for the District and suggested ways of distributing and managing future development needs (including any potential shortfall in land to meet the future housing needs of neighbouring Gloucester city). The paper presented four alternative patterns of future growth (Strategy Options A-D) for discussion. At this stage, the ‘strategy options’ were hypothetical, based upon the broad characteristics of Stroud District, its functionality and the role of our main settlements: the options did not go into detail in terms of identifying the potential sites or broad locations for development that might deliver each of them.



Issues and Options consultation

Sought views on whether, if housing, employment or community uses were required for the future, the Council had identified the best sites or whether there might be better alternative or additional locations.

2.2.2 However, alongside the discussion of hypothetical options, the paper separately presented a number of **“broad locations”** and **“potential sites”** for consultation. In section 3.6 of the **Issues and Option Paper**, a series of settlement summaries for each of the District’s Tier 1, Tier 2 and Tier 3 settlements* included maps showing all potential sites that were considered through the **2017 SALA**:

- “Suitable” sites (considered to have some future potential, subject to future strategy / policy framework) were outlined in red and labelled with their SALA site reference;
- Unsuitable / “rejected” SALA sites were outlined in blue and labelled with their SALA site reference;
- Potential broad locations for growth were identified in purple and labelled “A”, “B”, “C” etc.

2.2.3 On page 31, the Paper noted that “only the areas shown in purple are considered to have potential”. Some of the **76** purple-shaded **“broad locations”** were clearly related to identified (red-outlined) SALA sites. In some instances, only parts of the red-outlined sites were shaded purple, reflecting the conclusions of the **2017 SALA Report of Findings**, which found that parts of some sites would be unsuitable for development, due to constraints or potential impacts.

Sites carried forward



*Red-outlined sites were presented for public consultation. These were sites that had been identified through the 2017 SALA as either having “future potential” or as being deliverable and/or developable under the **current Local Plan policy framework**.*

(Additional “broad locations” introduced)



Some additional areas identified as having potential, and

* These are the District’s “main settlements”, defined as those classified within Tiers 1-3 of the 2015 (current) CP3 settlement hierarchy in the adopted Local Plan – including “anticipated” Tier 2 settlement, Hunts Grove.

- 2.2.4 Site allocations within the current (2015) Local Plan, which remained undeveloped / not yet committed development, were also identified as having potential (locations BRI-A, BRI-B and BRI-C at Brimscombe related to 2015 allocated sites SA1d, SA1e and SA1g).
- 2.2.5 Additionally, a small number of more hypothetical “**broad locations**” for future growth were identified on the periphery of some of the District’s main settlements. These were not linked with an already-identified site, but rather sought to indicate the least impactful direction(s) for settlement growth in landscape sensitivity terms⁶. These locations avoided natural environment constraints and areas of flood-risk. They were highlighted as locations where there might be scope to identify additional potential sites for assessment.
- 2.2.6 In section 3.2, which discussed the functional relationship between the northern fringe of Stroud District and the neighbouring city of Gloucester, four “**broad locations**” were highlighted (G1, G2, G3 and G4) as having potential to help meet some of Gloucester’s future needs.⁷
- 2.2.7 The **Issues and Options Paper** sought views on whether, if future housing, employment or community uses were required, the Council had identified the best sites at each Tier 1-3 settlement; or whether there were better alternative / additional locations or sites.
- 2.2.8 The consultation offered an opportunity for site promoters and consultees to advocate for the reintroduction of previously-rejected sites (the blue-outlined sites) by presenting new evidence and argument about their suitability, availability or deliverability. It also involved a **call for sites** at the identified broad locations and elsewhere.
- 2.2.9 The promotion of potential development at smaller villages and hamlets (Tier 4 and Tier 5 settlements) was also invited. The **Issues and Options Paper** explains on page 31 that such sites had not been fully assessed, because the District’s smaller settlements typically lack local services and facilities (making them generally less sustainable locations for growth). However, the consultation sought to identify particular growth or development needs at Tier 4 and 5 settlements. Moreover, since the pursuit of a dispersal strategy had not been ruled out at this stage (such as Option 3, which suggested that “small housing or employment sites are located at most of the District’s

additional sites in those locations were invited.

⁶ As evidenced by the 2016 **Stroud District Landscape Sensitivity Assessment**

⁷ G2 (SALA site BRO002 at Brookthorpe-with-Whaddon) is unique amongst the 76 broad locations identified in the **Issues and Options Paper**: it is remote from any Tier 1-3 settlement* and so was out-with the scope of the 2016 **Stroud District Landscape Sensitivity Assessment**. Landscape sensitivity here was assessed subsequently (2019, 2020), through the **Assessment of Strategic Development Opportunities in Parts of Gloucestershire**, jointly commissioned by Gloucestershire local authorities. This is referenced later in this topic paper at paragraphs 2.4.10 and 2.5.6



settlements”), it was important to build up a bank of potential sites at all of the District’s settlements, which could be fully assessed for suitability alongside an emerging development strategy, if required.

2.2.10 Table 7 (page 25) of the **Issues and Options Consultation Report** (February 2018) lists the number of comments submitted about each of the 76 broad locations shown in the consultation paper. All representations were published in full on the [Local Plan Review webpages](#). Full analysis of the responses was undertaken over the following months, which fed into the Emerging Strategy later in the year (see below).

2.2.11 **Identification of additional sites and broad locations**

30 new sites were submitted to the Council for consideration through the Issues and Options consultation. These are listed in Table 8 of the **Issues and Options Consultation Report** (page 26), and on the [Index of Representations Received](#), which was published online. All 30 sites were entered into the 2018 SALA Update.

➔ Sites in

Issues and Options ‘call for sites’ 2017: 30 sites submitted.

2.2.12 However, the SALA ‘*call for sites*’ effectively remained open between the close of the 2017 SALA and the commencement of site assessment for the SALA Update in Spring 2018. In total, **48** additional sites were identified for consideration in the SALA Update (including the 30 listed above). These are listed in the **Index of additional sites SALA 2018**.

➔ Sites in

SALA ‘call for sites’: 18 further sites promoted.

2.2.13 **SALA 2018 New Sites Update: Site assessment**

- **48** sites were included within the 2018 SALA Update.
- Of these, **4** sites were excluded from the SALA assessment for various reasons (refer to **Appendix 4** of the **2018 SALA New Sites Update Report**, July 2018).
- The remaining **44** were subject to site assessment and were visited by Officers during March 2018.

Sites carried forward

➔

2 sites identified as being deliverable and/or developable under the current Local Plan policy framework.

All **44** sites were assessed for their suitability for development, their availability and achievability, in accordance with the published **SALA Methodology**, as in 2016/17, including assessment of physical constraints, access to facilities and services and potential development impacts on the District’s natural and historic environment. The update did not undertake to reassess the delivery of any of the SALA sites that had been through the previous year’s SALA (2017). Hence the 2018 **SALA New Sites Update Report** should be read as an ‘addendum’ to the 2017 report, it does not supersede it.

A further 22 SALA sites were identified as having some future development potential, subject to a change of strategic/ policy framework. These sites were earmarked for consideration through the Local Plan Review.

2.2.14 The suitability assessment was informed by:

- **Stroud District Landscape Sensitivity Assessment** (December 2016)



- **SALA Heritage Impact Appraisal** (May 2018), which was carried out during March/April 2018 and which identified 16 sites with some degree of heritage sensitivity, where the potential impacts of development required assessment.
- Desktop flood risk assessment, using mapped data.
- Desktop ecology / biodiversity assessment, using mapped data from the Gloucestershire Centre for Environmental Records (GCER)
- **SALA Transport Accessibility Assessment** (July 2018), which was refreshed to provide data / scoring ⁸ for the 48 new sites.

 **Sites out**

Some sites (or parts of sites) were filtered out, if assessed as unsuitable due to constraints or potential impacts.

Very small sites (development potential below a threshold of 5 dwellings) were not fully assessed at this stage.

Sites lying beyond the periphery of Tiers 1, 2 and 3 settlements and those in remote rural locations were not fully assessed at this stage.*

2.2.15 The final **2018 SALA New Sites Update Report** (October 2018) identifies:

- deliverable and developable sites** (based on current policy framework / the 2015 Local Plan): a total of **2 new sites** were identified as having potential for additional development at the most sustainable settlements. Of these, 0 sites have potential for housing, 1 site for employment and 1 site for other uses. The 2018 Report's **Appendix 2** sets out the results for these 2 sites.
- sites with future potential** (depending on what a future development strategy and policy framework might consist of): whilst these sites are not in accordance with the current adopted (2015) **Local Plan** strategy and are therefore not currently deliverable, **22 new SALA sites** were considered to have future potential to contribute towards a theoretical land supply in the future, under a different strategic framework. Of which, 21 sites have potential for housing, 7 sites for employment and 12 sites for other uses. These sites were earmarked for consideration through the Local Plan Review. The 2018 Report's **Appendix 3** sets out the results for each of the 22 sites.

⁸ Data from the **Inform Gloucestershire** (formerly MAIDeN) (Gloucestershire County Council) **2018 "Accessibility Matrix"** – based on the public transport network that was in place as at January 2018, using destination data that was compiled in September 2016 and June 2018.

* These are the settlements in Tiers 1-3 of the 2015 (current) CP3 settlement hierarchy in the adopted Local Plan.



2.3 Local Plan Review: Emerging Strategy stage 2018-2019

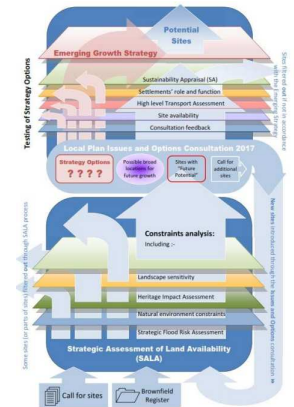
2.3.1 The ‘emerging strategy’ stage is a critical one, in terms of site selection: once an overall growth strategy is established, sites that do not fit with the strategic approach are no longer “suitable” for the plan. Individually, certain sites might be quite “suitable” for development (taking account of location, constraints, potential impacts, deliverability etc). However, as an example: very large sites, capable of delivering thousands of homes, would not be suited to a strategy based on dispersal; and conversely, small, remote, rural sites would not be suited to delivering a strategy founded on a large growth point or new settlement.

2.3.2 Prior to this stage, all sites had been assessed and presented on their individual merits, not as part of a ‘collective’ which could together deliver strategic goals and a certain quantum of growth for the District. As this stage of plan-making progressed, strategy options were refined and narrowed, and sites began to be discounted and filtered out, if they were not in conformity with the emerging growth strategy (see [diagram p18](#)).

2.3.3 Identifying potentially suitable, available and achievable sites, to test and refine the strategy options

Following The Issues and Options consultation (and concurrent with both consultation response analysis and the 2018 SALA new sites assessment), work began to refine the various growth strategy options and to develop a “preferred strategy”. In order to test whether the four growth strategy options set out in the 2017 **Issues and Options Paper** were reasonable and deliverable (and to compare their respective potential impacts), it was necessary to ‘put flesh on the bones’ of the hypothetical options by identifying potentially suitable, available and achievable sites that could feasibly contribute to the delivery of each one (and to that of any potential ‘hybrid’ options).

2.3.4 A Planning Review Panel working paper, entitled **Local Plan Review: Developing a preferred strategy** (revised March 2018), describes how the four options were to be ‘fleshed out’ by assigning development quanta to each strategy option, based on the location of potential sites that could ‘fit’ each strategy (e.g. which settlement/tier within the Local Plan settlement hierarchy), the size of site (e.g. small, medium or large) and the capacity of the site to accommodate other uses and supporting infrastructure. Potentially suitable and available sites were identified from a range of sources, including from the SALA, the Brownfield Register and sites



▲ The site assessment process

A diagram on page 31 of the **Emerging Strategy Consultation Paper** illustrates how sites had been identified, assessed and tested, up to this point. (Reproduced full size on p18)

Sites carried forward



Potentially suitable and available sites (already identified through the SALA, the Brownfield Register and the Issues and Options consultation) were assigned to various potential strategy options, in order to test deliverability and compare likely impacts.

promoted through the Issues and Options consultation.

2.3.5 These options were then further tested, by undertaking a series of planning and transport related assessments, together with a high level assessment of each option against sustainability objectives as identified through the **Sustainability Appraisal / Strategic Environmental Assessment** process, complemented by an assessment of individual site impacts:

2.3.6 **Sustainability Appraisal (SA) of the potential sites and strategy options**

Carried out independently by the Council’s appointed consultants, Land Use Consultants (LUC), SA work during Summer 2018 compared the four strategy options against 17 sustainability objectives, covering ‘social’, ‘economic’ and ‘environmental’ themes⁹. Each site identified in the 2017 **Issues and Options Paper** and all new sites assessed through the 2018 SALA update were also appraised against the 17 sustainability objectives, using indicators derived to determine minor and significant positive and negative effects. To ensure a consistent approach to the appraisal of the large number of site options considered, the SA (at this stage and all subsequent stages) made use of a number of assumptions which were presented in each iteration of the SA (most recently in Appendix 4 of the of **Sustainability Appraisal Report for the Stroud Local Plan Review: Pre-Submission Draft Plan**).

2.3.7 This work was originally presented in an internal SA note to Stroud District Council officers in late summer 2018 (**Sustainability Appraisal Findings for the Stroud Local Plan Review Site Options**, August 2018), so that the findings could be taken into account to inform the ‘emerging strategy’.

2.3.8 A key SA recommendation led to the emergence of a new ‘hybrid’ strategy option *“...which most resembles Option 1: Concentrated development, but which perhaps includes growth at the Sharpness growth point and / or one or two of the larger towns and villages as well (although this would need to avoid settlements where negative environmental effects on biodiversity / geodiversity, landscape / townscape, historic environment, water quality and flooding are more likely)”*.

2.3.9 This recommendation (alongside responses to the Issues and Options consultation and emerging evidence from the range of other studies that were undertaken during this Emerging Strategy stage) was significant: a new ‘hybrid’ growth strategy option began to emerge, incorporating some



SA Report (November 2018)

A key SA recommendation, leading to the emergence of a new ‘hybrid’ strategy option, was a significant influence on which potential sites were carried forward to the “Emerging Strategy”.

⁹ The sustainability objectives were agreed as part of the consultation undertaken on the Sustainability Appraisal Scoping Report from April 2018

of the most sustainable and deliverable aspects of the four hypothetical strategy options in the 2017 **Issues and Options Paper**. This inevitably influenced the selection of potential sites to take forward for consultation in the **Emerging Strategy Consultation Paper** later in 2018.

- 2.3.10 Ultimately, the SA findings and recommendations were published as the **Sustainability Appraisal Report for the Stroud District Local Plan Review: Emerging Strategy Paper** (November 2018), to accompany the autumn/winter Emerging Strategy consultation. *Chapter 5: Sustainability Findings for the Site Options* summarises the SA findings for each of the reasonable alternative site options that had been considered, structured by the type of site uses being considered: residential, employment, mixed use, community/retail and open space. The report explains that a small number of sites were appraised as options for more than one type of use.
- 2.3.11 Detailed findings for each site option are then presented in SA matrices found in **Appendix 5** (scoring sites against the 17 SA objectives for each of: 270 potential residential site options; 32 employment site options; 40 mixed use site options; 4 community and retail site options; open 6 space site options).
- 2.3.12 **Appendix 6** comprises detailed SA matrices specifically for the sites that went on to be included in the **Emerging Strategy Consultation Paper** (November 2018) (sites PS01 – PS41 and site G1 and G2) (i.e. sites that could be capable of delivering the emerging hybrid strategy). Usefully, **Appendix 7** includes Table A7.2, which is an audit trail showing whether each site option was selected or discounted for inclusion in the **Emerging Strategy Consultation Paper**, together with the Council’s reasons for inclusion or exclusion.
- 2.3.13 *Chapter 6: Sustainability Appraisal findings for the Emerging Strategy Paper* includes an appraisal of the policies, objectives and emerging hybrid growth strategy: the appraisal work at this stage reflected the policy direction set out for the strategy (rather than the high level assessment undertaken previously for the four hypothetical strategy options).
- 2.3.14 Headline SA findings at this stage are summarised in section 4.1 of the **Emerging Strategy Consultation Paper** (p28, p31).
- 2.3.15 **High level transport assessment: appraisal of potential sites and strategy options**
- Concurrent with the SA work during Summer 2018, Council officers carried out a high level transport assessment in consultation with officers from

Highways England and Gloucestershire County Council. The assessment sought to investigate the likely impacts of development from various groupings of sites, assigned to each of the four growth strategy options set out in the 2017 **Issues and Options Paper**¹⁰. It also identified potential transport improvements needed to support growth in each location. Findings are set out in the **Stroud Local Plan Review - Strategy Options Transport Discussion Paper** (July 2018) and a series of Appendices.

2.3.16 Headline findings from the high level transport assessment are summarised in section 4.1 of the **Emerging Strategy Consultation Paper** (p30, p31).

2.3.17 **Settlement role and function: identification of settlements where there is a case for growth**

Section 4.1 of the **Emerging Strategy Consultation Paper** (p30) explains that preparation of the emerging growth strategy and a revised settlement hierarchy involved studying the main towns and villages in the District, to identify their current and expected future roles and functions. During 2018, work was undertaken to review and update the **2014 Settlement Role and Function Study**, which supported the Settlement Hierarchy set out in CP3 of the current (2015) **Local Plan**.

2.3.18 Key findings from the **Stroud District Settlement Role and Function Study Update 2018** (SRFS Update) helped to establish the case for growth at each of the District’s settlements (summarised, settlement by settlement, in Chapter 5 of the **Emerging Strategy Consultation Paper**). This in turn fed into the emerging growth strategy and the consequent selection of suitable potential sites at specific settlements, which were capable of delivering that strategy.

2.3.19 **Habitats Regulations Assessment (HRA) of the potential sites**

The **Habitats Regulations Assessment of the Stroud Local Plan at Emerging Strategy Stage** (November 2018) reports the findings of the initial HRA screening, which was undertaken immediately prior to the finalisation of the Emerging Strategy for public consultation. Screening provides an early indication of the key policies, site allocations and aspects of the emerging plan that are likely to need further in depth assessment. All policies are checked as part of HRA, but of particular relevance is the quantum and

¹⁰ To aid the assessment process, potential sites with fewer than 300 dwellings were grouped together and assessed as one site for the *purposes of this transport assessment only*. For some of the rural Parish Clusters, the transport assessment was made using the site/location with the largest housing capacity. **Figure 1** (table) outlines which sites were assessed against each of the development options: only sites over 300 dwellings or with an employment allocation are specifically identified, while smaller sites are aggregated under their relevant Parish Clusters.



location of proposed growth.

2.3.20 The sites that were to be included in the **Emerging Strategy Consultation Paper** (sites PS01-PS41 and sites G1 and G2) (i.e. sites that could be capable of delivering the emerging hybrid strategy) were checked through this screening and scoping stage to identify risks to European sites. Chapter 3 covers HRA consideration of site options, including maps 2 and 3 which show the potential development sites in relation to European site buffer zones.

2.3.21 Chapter 4 contains the screening findings: Tables 3 and 4 record the conclusions drawn and any recommendations made in respect of any *likely significant effects* on European sites, which necessitate a more detailed appropriate assessment and could potentially signal a need for changes to the plan.

2.3.22 **Consultation on an emerging strategy and potential sites**

The **Emerging Strategy Consultation Paper** was published in November 2018 and public consultation ran until January 2019. The paper described a new ‘hybrid’ growth strategy to distribute at least 12,800 additional dwellings and sufficient new employment land to meet needs for the next 20 years, which incorporating some of the most sustainable and deliverable aspects of the four strategy options suggested in the 2017 **Issues and Options Paper**:

- Concentrating growth at the Tier 1 main towns
- Housing and employment growth also centred at two new settlements: Sharpness and Wisloe
- Strategic employment growth also concentrated within A38/M5 corridor
- Modest levels of growth delivered at Tier 2 local service centres
- Lesser levels of growth distributed to the most sustainable Tier 3 settlements (i.e. Tier 3a settlements with good accessibility to Stroud and Wotton-Under-Edge)¹¹.

2.3.23 Taking account of both environmental constraints and the availability of land surrounding the district’s settlements, potential sites for future growth in accordance with this emerging strategy were identified at the following Tier 1-3a settlements:



The Emerging Strategy

A key stage of the plan-making process: once an overall growth strategy is established, sites that do not fit with the strategic approach are no longer “suitable” for the plan. This consultation focused on specific identified sites that could deliver the emerging strategy.

Sites carried forward



41 potentially suitable and available sites (already identified and

¹¹ The **Emerging Strategy Consultation Paper** set out a proposed revised settlement hierarchy (CP3). The emerging strategy and subsequent phases of plan-making were thenceforth based upon this revised hierarchy, rather than the current hierarchy as set out in the 2015 Local Plan. The relationship between the Plan’s development strategy, site allocations and the revised settlement hierarchy is addressed in a separate Topic Paper.

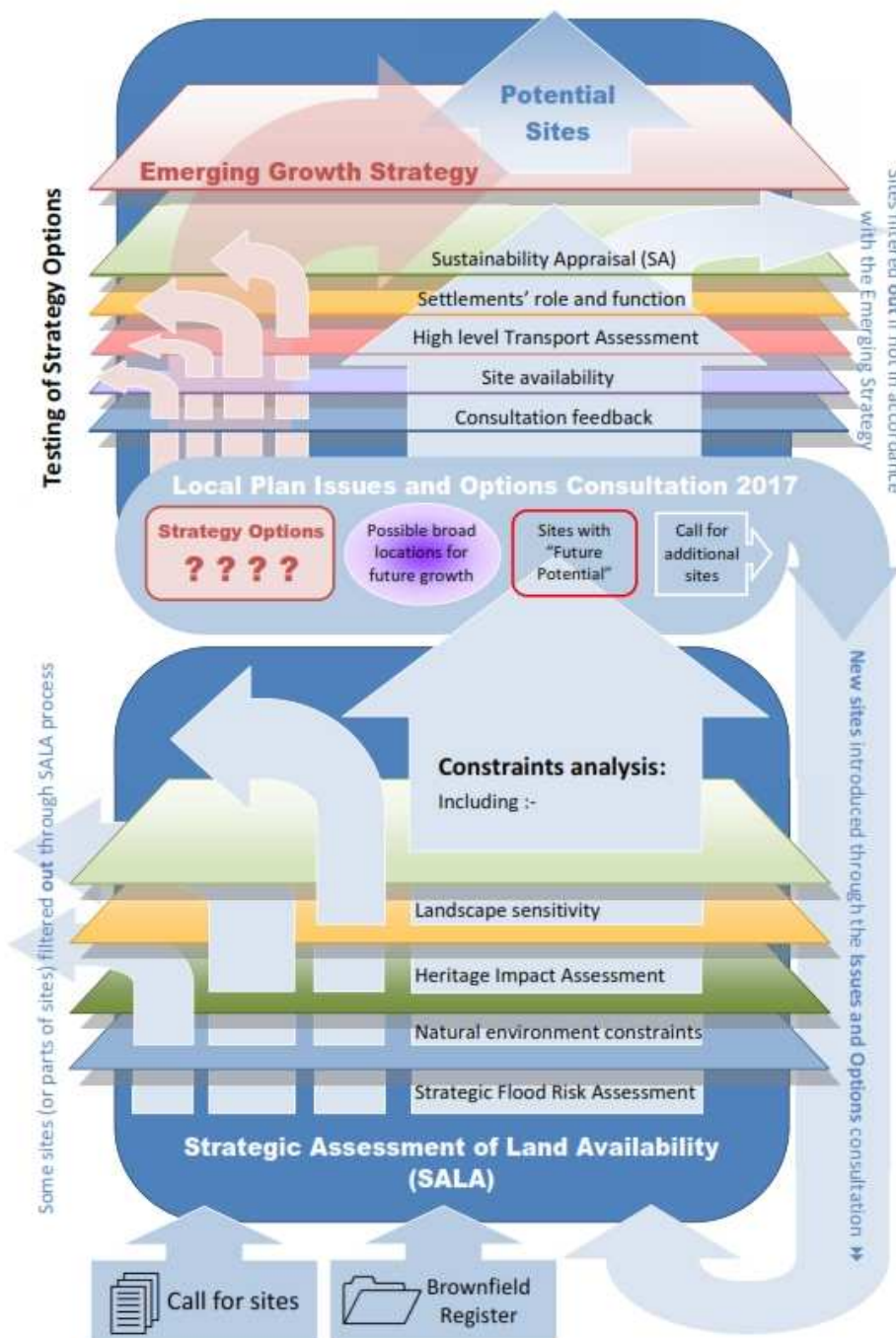


- Tier 1 main towns: Cam & Dursley, Stonehouse, Stroud
- Tier 2 local service centres: Berkeley, Minchinhampton, Nailsworth, Painswick; plus additional expansion of the emerging new Tier 2 settlement of Hunts Grove.
- Tier 3a villages: Brimscombe & Thrupp, Kings Stanley, Leonard Stanley, Kingswood, North Woodchester.

These potential sites were given a “PS” reference (sites numbered PS01 – PS41), which has been carried through the subsequent plan-making process.

assessed through the 2017 and/or 2018 SALA), which were in accordance with the emerging strategy, were identified and given a “PS” site reference number.

2.3.24



◀ The site assessment process

A diagram on page 31 of the Emerging Strategy Consultation Paper illustrates how sites had been identified, assessed and tested, up to this point (from the inception of the SALA in 2016, through to publication of the Emerging Strategy in November 2018).



2.3.25 Any sites that did not fit with this emerging growth strategy (in terms of both scale and broad location/settlement) were ‘filtered out’ at this stage. Where multiple site options existed at settlements that were earmarked for growth, the “PS” ‘preferred’ site(s) were those that had been assessed as the best fit in terms of scale, deliverability, sustainability and potential impacts. However, all realistic alternative site options were identified and presented in Chapter 5, settlement by settlement – including “rejected” sites, shown in blue and identified with their original SALA reference¹².

 **Sites out**

Sites ‘filtered out’ if not in accordance with the emerging strategy.

Some sites were “rejected” if a better alternative site existed.

2.3.26 The Duty to Cooperate with neighbouring authorities was highlighted as a key issue in 2017, particularly the **Joint Core Strategy’s** finding that additional sites will be required outside of Gloucester in order to meet the city’s future housing needs (beyond 2028). The **Emerging Strategy Consultation Paper** addressed this (page 35) and presented sites G1 (south of Hardwicke) and G2 (Whaddon) as land which might have potential to contribute towards meeting Gloucester’s unmet housing needs in the future, subject to being considered against all reasonable alternatives around the edge of the city.

Sites carried forward



Sites G1 and G2, identified as land which might have potential to contribute towards meeting Gloucester’s unmet housing needs, subject to further assessment.

2.3.27 Potential sites and alternatives were set out in Chapter 5. The chapter begins by explaining how sites had been identified and tested, and a series of consultation questions were posed. In summary:

- Have the right settlements been identified for growth, or do other settlements have growth potential?
- Assuming some growth is desirable, have the best site(s) been identified at each town or village? Or are there alternative sites that may be suitable?

2.3.28 The consultation offered an opportunity for site promoters and consultees to advocate for the reintroduction of “rejected” sites (the blue-outlined sites) by presenting new evidence and argument about their suitability, availability or deliverability. It also involved a **call for sites** at the identified settlements and elsewhere.

2.3.29 The promotion of potential development at smaller villages and hamlets (below Tier 3a) was also invited. Page 48 explains that such sites had not been fully assessed, because the District’s smaller settlements typically lack local services and facilities (making them generally less sustainable locations for growth). However, the consultation sought to identify particular growth

¹² Appendix 7 of the accompanying **Sustainability Appraisal Findings for the Stroud Local Plan Review Site Options**, (August 2018) includes table A7.2, which is an audit trail showing which sites were selected or discounted for inclusion in the emerging strategy, together with the Council’s reasons for inclusion or exclusion.



or development needs that might exist at the lowest tier settlements.


2.3.30 The **Emerging Strategy Consultation Report** (May 2019) provides a high level summary of the number and type of responses received, and sets out the level of support or opposition expressed for each of the potential sites in the consultation document (from page 37, including Table 6). The report also lists all new sites that were submitted for consideration (Table 7). All representations were published in full on the [Local Plan Review webpages](#). Detailed analysis of all comments made on the potential and alternative sites was undertaken during 2019 and 2020, alongside assessment of all new sites. The analysis was used to inform the next stage of the Local Plan Review (the Draft Plan) (see below).

2.3.31 **Identification of additional sites**

35 new sites were submitted to the Council for consideration through the Emerging Strategy consultation. These are listed in Table 7 of the **Emerging Strategy Consultation Report** (page 39), and the site submission forms were published on [the Emerging Strategy Local Plan Review webpage](#). All 35 sites were entered into the 2019 SALA Update.

 Sites in *Emerging Strategy 'call for sites' 2018/19: 35 sites submitted.*


2.3.32 However, the SALA *'call for sites'* effectively remained open between the close of the 2018 SALA Update and the commencement of site assessment for the next Update in Summer 2019. In total, **52** additional sites were identified for consideration in the 2019 SALA Update (including the 35 listed above). These are listed in the **Index of additional sites SALA 2019**.

 Sites in *SALA 'call for sites': 17 further sites promoted.*

2.3.33 **SALA 2019 New Sites Update: Site assessment**

- **52** sites were included within the 2019 SALA Update.
- Of these, **5** sites were excluded from the SALA assessment for various reasons (refer to **Appendix 4** of the **2019 SALA New Sites Update Report**, November 2019).
- The remaining **47** were subject to site assessment and were visited by Officers during summer 2019.

All **47** sites were assessed for their suitability for development, their availability and achievability, in accordance with the published **SALA Methodology**, as in 2016/17 and 2018, including assessment of physical constraints, access to facilities and services and potential development impacts on the District's natural and historic environment. The update did not undertake to reassess the delivery of SALA sites that were previously assessed in 2017 or 2018.

Sites carried forward


*5 sites identified as being deliverable and/or developable under the **current** Local Plan policy framework.*

*A further **9** SALA sites were identified as having some future development potential, subject to a change of strategic/ policy framework. These sites were earmarked for*



2.3.34 The suitability assessment was informed by:

- **Stroud District Landscape Sensitivity Assessment** (December 2016)
- **SALA Heritage Impact Appraisal** (September 2019), which was carried out during summer 2019 and which identified 19 sites with some degree of heritage sensitivity, where the potential impacts of development required assessment.
- Desktop flood risk assessment, using mapped data.
- Desktop ecology / biodiversity assessment, using mapped data from the Gloucestershire Centre for Environmental Records (GCER)
- **SALA Transport Accessibility Assessment** (October 2019) provided new data / scoring¹³ for each of the 52 new sites. At this point, the matrix was also re-run to provide updated scoring for all previous SALA sites (those subject to assessment in 2017 and 2018), to ensure that all sites had been subject to consistent scoring and to allow level comparison going forward.

consideration through the Local Plan Review.

← Sites out

Some sites (or parts of sites) were filtered out, if assessed as unsuitable due to constraints or potential impacts.

Very small sites (development potential below a threshold of 5 dwellings) were not fully assessed at this stage.

2.3.35 The final **2019 SALA New Sites Update Report** (November 2019) identifies:

- i) **deliverable and developable sites** (based on current policy framework / the 2015 Local Plan): a total of **5 new sites** were identified as having potential for additional development at the most sustainable settlements. Of these, 5 sites have potential for housing, 0 sites for employment and 0 sites for other uses. The 2019 Report's **Appendix 2** sets out the results for each of these 5 sites.
- ii) **sites with future potential** (depending on what a future development strategy and policy framework might consist of): whilst these sites are not in accordance with the current adopted (2015) **Local Plan** strategy and are therefore not currently deliverable, **9 new SALA sites** were considered to have future potential to contribute towards a theoretical land supply in the future, under a different strategic framework. Of which, 0 sites have potential for housing, 3 sites for employment, 6 sites for mixed-use and 0 sites for other uses. These sites were earmarked for consideration through the Local Plan Review. The 2019 Report's **Appendix 3** sets out the results for each of the 9 sites.

Sites lying beyond the periphery of Tiers 1, 2 and 3 settlements and those in remote rural locations were not fully assessed at this stage.*

¹³ Data from the **Inform Gloucestershire** (formerly MAIDeN) (Gloucestershire County Council) **2019 "Accessibility Matrix"** – based on the public transport network that was in place as at September 2018, using destination data that was compiled in September 2018 and October 2019.

* These are the settlements in Tiers 1-3 of the 2015 (current) CP3 settlement hierarchy in the adopted Local Plan.



2.4 Local Plan Review: Draft Plan stage 2019-2020

2.4.1 Identifying suitable, available and achievable sites, to deliver the preferred growth strategy

Following The Emerging Strategy consultation (and concurrent with both consultation response analysis and the 2019 SALA new sites assessment), work continued on:

- assembling evidence to test and further refine the “preferred strategy”, so that it would clearly address the district’s identified needs;
- drafting a policy framework to support and deliver the overall strategy;
- identifying suitable, available and achievable sites, to deliver the preferred growth strategy

Sites carried forward



Potentially suitable and available sites (already identified through the SALA, and including those consulted on in the Emerging Strategy) were further scrutinised.

2.4.2 This included a review of all red-outlined potential sites in the **Emerging Strategy Consultation Paper**, carried out by Officers in Spring and early Summer 2019, to identify any site-specific issues raised through public consultation and to establish whether additional information or evidence was required in order to progress the sites. Any new sites (which were still awaiting SALA assessment at that point) that might have potential to contribute towards the preferred growth strategy were also flagged for attention.

← Sites out

3 sites included in the Emerging Strategy (PS09, PS14, and PS31) were by now committed development, so were progressed no further as potential allocations.

2.4.3 Subsequent months, leading up to the publication of the **Draft Plan for Consultation** in November 2019, involved the commissioning and assembly of necessary evidence documents, liaison with key stakeholders, statutory consultees and site promoters and the synthesis of a range of information into draft site allocation policies:

2.4.4 Landscape and visual issues in the AONB: appraisal of potential sites

White Consultants were commissioned during summer 2019 to carry out an independent appraisal of the landscape and visual issues relating to sites within or in the setting of the Cotswolds AONB. The brief required advice on the following issues:

- A view on points raised by Natural England and the AONB Conservation Board relating to potential site impacts on the AONB.
- A view on any potential options for amending site boundaries to reduce or remove potential impacts.



- Consideration of broad mitigation measures and a commentary on landscape material provided by site promoters, if available, to aid discussions regarding site concept plans and policy wording.

2.4.5 Sites within the AONB that had been included in the **Emerging Strategy Consultation Paper**:

- PS04 South of Cirencester Road, Minchinhampton
- PS05 East of Tobacconist Road, Minchinhampton
- PS07 Nymphsfield Road, Nailsworth
- PS41 Washwell Fields, Painswick

And those within the setting of the AONB:

- PS19a North of Stonehouse
- PS29 Ganzells Lane, Dursley

2.4.6 A series of meetings was held (July 2019) between Stroud District Council, the Cotswold Conservation Board and relevant promoters to discuss the sites within the AONB. This allowed for issues to be discussed and further information requested.

2.4.7 The final **Evaluation of Site Landscape and Visual Issues Report** was published in October 2019. Ongoing dialogue between parties resolved some outstanding issues, allowing some of these sites to be carried forward as proposed allocations in the Draft Plan. But AONB issues contributed to PS04 and PS29 being progressed no further as proposed allocations. These sites do not appear in the **Draft Plan for Consultation**. PS05 at Minchinhampton was carried forward, but reduced in size, in part to better reflect the scale of local housing need.

2.4.8 **Level 2 Strategic Flood Risk Assessment (SFRA): appraisal of potential sites**

The **Stroud Level 2 Strategic Flood Risk Assessment (SFRA)** (draft report, November 2019) assessed site options identified for potential allocation (subsequent to the Emerging Strategy consultation, and taking account of any new sites being progressed as potential allocations for the Draft Plan). Detailed site summary tables were produced for the following potential sites (found in **Appendix O**): PS13 (Stroud), PS20 (Stonehouse), PS25 (Cam), PS33 (Berkeley), PS34 and PS36 (Sharpness), PS37 (Wisloe), PS47 (Kingswood).

2.4.9 Where available, the results from existing detailed Environment Agency hydraulic models were used in the assessment to provide depth, velocity and hazard information. Using the model information combined with the

Sites carried forward



Where AONB issues could be satisfactorily resolved.

Sites out

AONB issues contributed to 2 sites progressing no further as proposed allocations.

Flood Zones, climate change and Risk of Flooding from Surface Water (RoFFSW) extents, detailed site summary tables were produced for the site options (see **Appendix P**).

2.4.10 **Identifying suitable and available strategic development land to meet Gloucester’s unmet future needs**

An assessment of potential alternative sites to meet Gloucester’s long term housing needs was commenced in 2019, jointly commissioned by Gloucester City Council, Cheltenham Borough Council, Tewkesbury Borough Council, Stroud District Council and Forest of Dean District Council. Land south of Hardwicke and at Whaddon (encompassing the Emerging Strategy potential sites G1 and G2) were included in the assessment, together with other sites both within and on the edge of Gloucester, but within neighbouring council areas. These Gloucestershire authorities are committed to working together and have agreed that the best performing site(s) from the joint assessment study will be identified for potential allocation in the respective council’s future draft plans.

2.4.11 In Stroud District, the assessment ‘areas of search’¹⁴ extend southwards from Gloucester’s southern edge, broadly following the M5 / A38 / rail corridor, as far as the district boundary with South Gloucestershire. This takes in some key sites and locations for Stroud District’s emerging plan – not only the G1 and G2 sites, but also land at Wisloe and Sharpness (both identified as potential new settlements) and at Moreton Valence and Whitminster (which were subsequently to be identified as ‘potential growth points’ PGP1 and PGP2 in the 2020 **Draft Local Plan | Additional Housing Options** Consultation).

2.4.12 The **Assessment of Strategic Development Opportunities in Parts of Gloucestershire: Interim Assessment Outputs**, published October 2019, was able to inform the emerging **Draft Plan for Consultation**. It indicated that Whaddon may be amongst the county’s better performing options.

2.4.13 The interim outputs included a comparison of the area’s landscape sensitivity against other locations in Gloucestershire. It is worth noting that this is a valuable addition to the Local Plan Review evidence base, since the **Stroud District Landscape Sensitivity Assessment** (December

Sites carried forward



Site G2 identified as land which might have potential to contribute towards meeting Gloucester’s unmet housing needs, subject to further assessment.

¹⁴ The study’s 55 ‘search areas’ (subsequently referred to as ‘assessment areas’ in the 2020 final report) are mapped in Figure 1.3 of the **Assessment of Strategic Development Opportunities in Parts of Gloucestershire: Interim Assessment Outputs** (October 2019). Whaddon (G2) lies within Area 32 and Hardwicke (G1) within Area 36. Areas 40 and 43 cover the land at Moreton Valence and at Whitminster, which were subsequently to be identified as ‘potential growth points’ (PGP1 and PGP2) in the 2020 **Draft Local Plan | Additional Housing Options** Consultation. Area 49 covers the land promoted as the Wisloe new settlement (PS37) and Area 52 covers the Sharpness new settlement (PS36) – however, these latter two areas were not included in the 2019 **Interim Assessment Outputs**, only in the full report (May 2020).

2016), which is extensively relied upon for SALA site assessments, did not assess landscape parcels that are remote from Tier 1-3 settlements, as the G2 site is. The proposed new settlements at Sharpness (PS36) and Wisloe (PS37) were similarly out-with the scope of the 2016 landscape assessment, but were covered by this assessment¹⁵ (see **Appendix 2b** of the final **Assessment of Strategic Development Opportunities in Cheltenham Borough, Gloucester City, Tewkesbury Borough, Stroud District and Parts of Forest of Dean District**, May 2020) (see **paragraph 2.5.6** below).

2.4.14 The **Emerging Strategy Consultation Paper** (p35) had highlighted that there was potential to review how the sites at Whaddon and south of Hardwicke might contribute instead to Stroud District’s future needs, should other alternative sites be preferred and/or if they were no longer needed by Gloucester. Whilst the Whaddon site is remote from any of Stroud District’s Tier 1-3 settlements and does not generally conform to the emerging growth distribution strategy, arguably the land south of Hardwicke (a Tier 3a settlement, located within the rail/A38/M5 corridor, adjacent to what will become a Tier 2 settlement in the future) could do. Whilst Hardwicke, like neighbouring Quedgeley, forms part of the Gloucester Urban Area, the Hardwicke area has an important role within Stroud District: with three key employment sites nearby, this is one of the District’s employment hubs and the settlement functions as significant ‘dormitory’ for a large working population. The south of Hardwicke G1 site was therefore carried forward to Draft Plan stage, with a view to consulting upon its potential fit with the plan’s evolving development strategy.

Sites carried forward



Site G1 may have potential to contribute Stroud District’s housing needs, in a manner that conforms with the emerging growth strategy

2.4.15 **Habitats Regulations Assessment (HRA) of potential sites**

The parameters for consideration of proposed site allocations are set out in Chapter 3 of the **Habitat Regulations Assessment of the Stroud Local Plan at Draft Plan Consultation Stage**, published November 2019.

2.4.16 Chapter 10 explains that the screening for likely significant effects considers each of the proposed allocations at draft plan stage. For the majority of allocations, either likely significant effects can be ruled out, or their impacts solely relate to matters covered within the strategic mitigation approaches for recreation, either in place, being reviewed or being considered. As an iterative assessment, the HRA was to be updated

Sites carried forward



Subject to the instatement of adequate strategic mitigation approaches

¹⁵ This Assessment also became a key part of the evidence base for the land at Moreton Valence and at Whitminster, which were included in the 2020 SALA and subsequently identified as ‘potential growth points’ (PGP1 and PGP2) in the 2020 **Draft Local Plan | Additional Housing Options** Consultation.



following those reviews and considerations.

2.4.17 However, the proposed new settlement at Sharpness raises a number of potential impact pathways in relation to the Severn Estuary. The HRA notes that at this Regulation 18 stage, it is necessary to highlight that the Sharpness settlement requires a range of additional assessment work that needs to be informed by a number of discussions with technical specialists and also some evidence that is not yet available. A HRA conclusion cannot be drawn at this Draft Plan stage, but a series of recommendations are provided to assist with a much more detailed analysis to inform the Regulation 19 stage of plan making.

2.4.18 **Sustainability Appraisal (SA) of potential sites**

LUC, the Council’s SA Consultants, produced a **Sustainability Appraisal Report for the Stroud District Local Plan Review – Draft Plan** (November 2019), to accompany the Draft Plan consultation. This effectively appraises the output of all the evidence gathering and site assessment up to this point.

2.4.19 Chapter 5 sets out the SA findings for the 35 draft site allocations included in the **Draft Plan for Consultation**, and provides a concise and useful summary of site-specific issues relating to the 17 SA objectives¹⁶. Table 5.1 lists all of the draft site allocations included in the Draft Plan and shows how each draft site allocation relates to those site options previously appraised as part of the Emerging Strategy stage in 2018, and where any updates have been made to the site boundaries. Draft site allocations that were not previously included in the **Emerging Strategy Consultation Paper** are highlighted in green (these had come forward since that consultation).

2.4.20 Meanwhile, **Appendix 5** usefully sets out the summary of SA findings for *all* site options considered at *each stage* of plan preparation (presented in Table A5.1 to Table A5.6), followed by the detailed appraisal matrices. It should be noted that the appraisal of all the reasonable site options in **Appendix 5** was undertaken on a consistent basis using the SA assumptions set out in **Appendix 4**, and without taking any policy requirements into account (i.e. ‘policy-off’).

2.4.21 **Appendix 8** (Table A8.2) outlines an ‘audit trail’ of the Council’s reasons for selecting sites as draft site allocations (as well as the reasons for discounting

¹⁶ It is important to note that the summary of effects presented in Chapter 5 (and the corresponding detailed appraisal matrices for the draft site allocations presented in Appendix 7) did take the information provided for each site allocation within the Draft Plan into account (i.e. the quantum and type of development proposed, and the fact that detailed policy criteria were to be developed to highlight specific mitigation measures and infrastructure requirements, along with a development brief incorporating a masterplan).

the alternative site options that were not included) up to this point.

2.4.22 Consultation on a draft strategy, policies and potential sites

The **Draft Plan for Consultation** was published in November 2019. Public consultation ran until January 2020. At this stage, the Draft Plan identified site outlines and included some draft policy wording for each proposed site allocation. The policies were not accompanied by full supporting text. This was to be developed and refined for the next iteration of the Local Plan (the Pre-submission Plan), taking account of the evidence and relevant views expressed through this public consultation.



The Draft Plan

Based on a refined version of the 2018 Emerging Strategy, the Draft Plan carried forward many of the sites identified previously. A small number of new sites were introduced and 14 sites were 'dropped'.

2.4.23 The Draft Plan strategy advanced the main pillars of the 2018 Emerging Strategy:

- Concentrating growth at the Tier 1 main towns
- Housing and employment growth also centred at two new settlements: Sharpness and Wisloe
- Strategic employment growth also concentrated within A38/M5 corridor
- Modest levels of growth delivered at Tier 2 local service centres
- Lesser levels of growth distributed to the most sustainable Tier 3 settlements (i.e. Tier 3a settlements with good accessibility to Stroud and Wotton-Under-Edge, whose growth potential is limited by environmental constraints).

2.4.24 Taking account of both environmental constraints and the availability of land surrounding the district's settlements, potential sites for future growth in accordance with this emerging strategy were identified at the following Tier 1-3a settlements:

- Tier 1 main towns: Cam & Dursley, Stonehouse, Stroud
- Tier 2 local service centres: Berkeley, Minchinhampton, Nailsworth and Painswick; plus additional expansion of the emerging new Tier 2 settlement of Hunts Grove; and a new planned Tier 2 settlement at Sharpness.
- Tier 3a villages: Brimscombe & Thrupp, Leonard Stanley, Frampton-on-Severn, Whitminster, Hardwicke and Kingswood; with already committed development at North Woodchester and Kings Stanley; and a new planned Tier 3a settlement at Wisloe.

2.4.25 The 35 proposed site allocations had all been included within the **Emerging Strategy Consultation Paper**, with the exception of PS42 (Leonard

Sites carried forward



A total of 34 sites were progressed as draft site allocations to deliver the growth strategy and meet Stroud District's identified future needs (including 3 new sites and 3 sites that had been previously "rejected").

Additionally, 1 site (G2) was progressed as land with potential to contribute towards meeting Gloucester's unmet housing needs, pending further assessment and

Stanley), PS43 (Hardwicke / Hunts Grove) and PS47 (Kingswood), which were newly promoted sites that had been assessed through the 2019 SALA and were considered to fit within the Plan’s overall growth strategy. In addition, PS44 (Frampton on Severn), PS45 and PS46 (Whitminster) had been shown as blue-outlined “rejected” sites at Emerging Strategy stage, since the scale of development proposed at each would not have accorded with the emerging strategy, which allowed for only limited levels of development at Tier 3a settlements with good accessibility to Stroud and Wotton. The Draft Plan’s strategy instead targeted a little bit of growth towards an expanded range of Tier 3a settlements outside of the AONB, acknowledging those settlements’ potential for enhanced transport links and their capacity to accommodate some growth due to their relative lack of environmental constraint¹⁷.

consideration against all reasonable alternatives.

2.4.26 The following sites had been included in the **Emerging Strategy Consultation Paper**, but following public consultation, liaison with site promoters and additional evidence-gathering, they were not progressed as draft site allocations:

- PS03 Brimscombe
- PS04 Minchinhampton
- PS08 Nailsworth
- PS09 North Woodchester
- PS14 and PS15 Kings Stanley
- PS18 and PS19a Stonehouse
- PS22 and PS23 Cam
- PS26 and PS29 Dursley
- PS31 Hardwicke / Hunts Grove
- PS39 and PS40 Kingswood / Wotton-Under-Edge

← Sites out

14 sites, which had appeared in the Emerging Strategy, were dropped from the Draft Plan.

The **Sustainability Appraisal Report for the Stroud District Local Plan Review – Draft Plan** (November 2019), **Appendix 8** (Table A8.2), usefully summarises the diverse reasons for not including these site options within the Draft Plan, which included deliverability, unresolvable impacts and some sites having already been progressed to planning permission.

2.4.27 The consultation document asked:

- Are there any additional issues or constraints relating to the proposed sites? And how should specific constraints, needs and opportunities be

¹⁷ The **Sustainability Appraisal Report for the Stroud District Local Plan Review – Draft Plan** (November 2019), **Appendix 8** (Table A8.2) outlines an ‘audit trail’ of the Council’s reasons for selecting or discounting sites as Emerging Strategy stage and Draft Plan stage



reflected in the final site allocation policies?

2.4.28 At this stage, additional or alternative sites were not explicitly sought. However, a SALA **call for sites** was publicised and run alongside the Draft Plan consultation.

2.4.29 Numerous comments were received about proposed, previously rejected or new additional / alternative sites. Detailed analysis of all consultation responses was undertaken during 2020 and early 2021, prior to the finalisation of the **Pre-Submission Draft Plan** in May 2021. A comprehensive **Draft Plan for Consultation November 2019 Consultation Report** was produced in April 2021 – see below, under 2.5 which covers the **Pre-Submission Draft Plan stage**.

2.4.30 Identification of additional sites

Since the publication of the **2019 SALA New Sites Update Report**, a total of **28** additional sites were submitted to Stroud District Council for consideration, most of which were submitted as part of the Draft Plan consultation. These new sites, not previously assessed, are listed in the **Index of additional sites SALA 2020** and their individual site submission forms are published on the SALA page of the Council’s website. They were subsequently assessed (summer 2020) and reported on in the **2020 SALA New Sites Update Report** (October 2020).

➔ Sites in

SALA ‘call for sites’ and Draft Plan consultation 2019/10: 28 new sites submitted.

2.4.31 SALA 2020 New Sites Update: Site assessment

- **28** sites were included within the 2020 SALA Update.
- Of these, **7** sites were excluded from the SALA assessment for various reasons (refer to **Appendix 4** of the **2020 SALA New Sites Update Report**, October 2020).
- The remaining **21** were subject to site assessment and were visited by Officers during spring/summer 2020.

Sites carried forward



*2 sites identified as being deliverable and/or developable under the **current Local Plan policy framework**.*

All **21** sites were assessed for their suitability for development, their availability and achievability, in accordance with the published **SALA Methodology**, as in 2016/17, 2018 and 2019 including assessment of physical constraints, access to facilities and services and potential development impacts on the District’s natural and historic environment. The update did not undertake to reassess the delivery of SALA sites that were previously assessed in 2017, 2018 or 2019.

*A further **8** SALA sites were identified as having some future development potential, subject to a change of strategic/ policy framework. These sites were earmarked for consideration through the **Local Plan Review**.*



2.4.32 The suitability assessment was informed by:

- **Stroud District Landscape Sensitivity Assessment** (December 2016)¹⁸
- **SALA Heritage Impact Appraisal** (October 2020), which was carried out during summer 2020 and which identified 11 sites with some degree of heritage sensitivity, where the potential impacts of development required assessment.
- Desktop flood risk assessment, using mapped data.
- Desktop ecology / biodiversity assessment, using mapped data from the Gloucestershire Centre for Environmental Records (GCER)¹⁹
- **SALA Transport Accessibility Assessment** (October 2020) was a complete refresh, providing new data / scoring²⁰ for each of 431 sites (new sites for 2020, as well those included in the 2017, 2018 and 2019 SALAs), to ensure that all sites had been subject to consistent scoring and to allow level comparison going forward.

 **Sites out**

Some sites (or parts of sites) were filtered out, if assessed as unsuitable due to constraints or potential impacts.

Very small sites (development potential below a threshold of 5 dwellings) were not fully assessed at this stage.

2.4.33 The final **2020 SALA New Sites Update Report** (October 2020) identifies:

- i) **deliverable and developable sites** (based on current policy framework / the 2015 Local Plan): a total of **2 new sites** were identified as having potential for additional development at the most sustainable settlements. Of these, 1 has potential for housing, 0 sites for employment and 1 site for other uses. The 2020 Report's **Appendix 2** sets out the results for each of these 5 sites.
- ii) **sites with future potential** (depending on what a future development strategy and policy framework might consist of): whilst these sites are not in accordance with the current adopted (2015) **Local Plan** strategy and are therefore not currently deliverable, **8 new SALA sites** were considered to have future potential to contribute towards a theoretical land supply in the future, under a different strategic framework. Of which, 5 sites have potential for housing, 1 site for employment, 2 sites for mixed-use and 0 sites for other uses. These sites were earmarked for consideration through the Local Plan Review. The 2020 Report's **Appendix 3** sets out the results for each of the 8 sites.

¹⁸ The **Assessment of Strategic Development Opportunities in Cheltenham Borough, Gloucester City, Tewkesbury Borough, Stroud District and Parts of Forest of Dean District** (May 2020) provided supplementary landscape sensitivity information in respect of SALA site WHI014, which was promoted at this stage as a single growth point and which was subsequently consulted upon in the autumn 2020 **Draft Local Plan | Additional housing options** paper.

¹⁹ All SALA sites were the subject of desktop study work carried out by the District Ecologists using Gloucestershire Centre for Environmental Records data, Naturespace Great Crested Newt maps and Natural England MAGIC maps.

²⁰ Data from the **Inform Gloucestershire (MAIDeN)** (Gloucestershire County Council) **2020 "Accessibility Matrix"** – based on the public transport network that was in place as at January 2020, using destination data that was compiled in September 2018 and October 2019.



2.4.34 **Draft Plan | Additional Housing Options consultation October 2020: Identification of additional sites**

During Autumn 2020, the Council undertook a focused consultation in response to the Government’s published proposals to revise the way the minimum housing requirement is calculated for each local authority – These proposals would potentially have required Stroud District to find land for an additional 1,500 – 2,400 homes over the Plan period. In the event, the Government has not implemented the proposed changes, so the very significant implications for the emerging Local Plan did not come to pass.

2.4.35 The narrow focus of this consultation was on a range of potential spatial and site options, which might be deployed if a change of strategy was necessitated. The **Draft Plan | Additional housing options Consultation Paper** presented a small number of new sites, which had been promoted through the Draft Plan consultation and subsequently assessed through the 2020 SALA.

2.4.36 The several sites introduced at this consultation stage are sites that could potentially have helped to deliver a revised growth strategy and/or a reserve housing supply; some - but not all - of them also accord with the strategy set out in the previous year’s **Draft Local Plan for Consultation**.

2.4.37 Two large potential ‘Growth Points’ were introduced:

- PGP1: WHI014 was promoted as a single growth point through the Draft Plan consultation / call for sites in 2019/20, and was assessed through the **2020 SALA New Sites Update**; however, the entire growth point area incorporated a site that was previously submitted and assessed as part of the **2018 SALA New Sites Update** (WHI007), which the 2020 assessment references.
- PGP2: A collection of separate and overlapping sites, all previously assessed through the **2016 SALA** or the **2019 SALA New Sites Update**.

These earlier SALA sites had previously been ‘filtered out’ as not in accordance with the emerging strategy. However, SA work helped to identify that a new growth point, potentially located along one of the main movement corridors within the District (A38, A419, A4135) where most future transport improvements will be located, was a potential spatial option worth investigating (“Option C” in the **Additional housing options Consultation Paper**). For the purposes of this consultation, a mapping review of newly-promoted sites and ‘clusters’ of previously-assessed sites located along these movement corridors was undertaken, resulting in the identification of PGP1 and PGP2.

Sites carried forward



5 new small housing sites introduced, having been assessed through the 2020 SALA.

2 large potential ‘growth points’ presented, both of which reintroduced sites that had been previously “rejected”.

2.4.38 The consultation included a *call for further sites*, which might have potential to deliver any of the identified alternative strategy options, or contribute to a reserve housing supply. The paper also explained that some of the strategy options would require previously-assessed sites at Tier 1-3 settlements (which do not necessarily fit with the Draft Plan Strategy) to be reconsidered. Furthermore, should spatial “Option D” (wider dispersal) be pursued, it would entail fully assessing any previously-identified sites at Tier 4 settlements (which do not accord with the Emerging / Draft Plan strategy, and which consequently have not been fully assessed through past SALAs).

2.4.39 **Additional Housing Options: HRA and SA of additional sites**

The **Habitats Regulations Implications and considerations relating to the Stroud Local Plan Review Draft Plan Additional housing options consultation** (October 2020) is a short report which considers the HRA implications for the different spatial options and the additional sites.

2.4.40 The **Sustainability Appraisal Findings for the Stroud Local Plan Review Additional Housing Options** (October 2020) main report presents the SA findings for the additional spatial options²¹ and sets out the assessment of 28 additional sites that were promoted at Draft Plan stage, including the two additional potential growth points (PGP1 and PGP2).

2.4.41 **Additional Housing Options: consultation responses**

Analysis of the consultation responses to this focused consultation was carried out during early 2021, concurrent with drafting a comprehensive consultation report for the 2019 **Draft Plan** (see below), and subsequent to the Government’s withdrawal on 16th December 2020 of its proposed revised methodology for calculating housing requirement. Drafting of the Pre-Submission Draft Plan was also under way – so several strands of the plan-making process were being synthesised.

2.4.42 Consultation responses about the five small housing sites are summarised on pages 16-21 of the **Local Plan Review: Additional Housing Options Consultation Report** (April 2021); and about the two growth points on pages 21-24. The Council’s response explains that the following sites will be taken forward as proposed allocations, as they are suitable for development that accords with the Draft Plan strategy:

- BER016 and BER017

Sites carried forward



4 new small housing sites were progressed as proposed site allocations to deliver the growth strategy and meet Stroud District’s identified

²¹ Appraisal of the additional spatial options is presented alongside an appraisal of the Draft Plan’s hybrid growth strategy and the initial four strategy options that featured at Issues and Options stage, using a ‘policy-off’ approach to allow for a more direct comparison between all these options.

- HAR017
- STR065

future needs.

 **Sites out**

Remaining new small sites and potential growth points 'rejected' (see also paragraph 2.4.45 below)

However, the other sites contained in the **Draft Plan | Additional housing options Consultation Paper** either do not accord with the Draft Plan Strategy, or perform less well than already-identified alternatives, in terms of meeting SA objectives (see below, specifically in relation to potential strategic housing sites and growth points); hence these sites were rejected at this stage.

2.4.43 In response to the call for sites, a total of 26 new sites were suggested for future housing development. However, the Council's response explained that: *"On 16 December 2020 the Government withdrew the proposals to increase the local housing need to 786 homes per annum and reverted back to the 630 homes per annum that we have been planning for through the Local Plan Review. Therefore, the Council does not need to identify new sites at this time as sufficient land has been identified to meet the minimum housing requirements. Any new sites submitted, but not previously assessed as part of the Strategic Assessment of Land Availability (SALA) 2017 – 2020 will be assessed as part of the 2021 update later in the year"* and that these would be *"available for consideration as potential suitable and available site options as part of the Local Plan Review process, if additional sites are required."*

2.4.44 However, both the results of public consultation and the SA assessment work for the Additional Housing Options stage were valuable in confirming the view that intensifying development where possible at strategic urban extension sites was a sustainable option (what was mooted as "Option A"). Initial masterplanning work showed that some of the potential urban extension sites could increase their densities, hence the final Pre-Submission Draft Local Plan development strategy was subsequently refined to increase the housing contribution of PS19a (Stonehouse), PS24 (North West Cam) and G1 (south of Hardwicke).

2.4.45 **Further comparative assessment of strategic housing sites and potential growth points**

A review of all reasonable potential strategic housing sites and potential growth points was carried out, taking account of SA work at both Draft Plan stage and Additional Housing Options stage, along with other considerations, to ensure the best-performing sites were selected to carry forward to Pre-submission stage. This involved all the strategic sites from the **Draft Local Plan for consultation**, plus the two additional potential growth points (PGP1 at Whitminster and PGP2 at Moreton Valence). Other



potential strategic sites had previously been filtered out through the SALA and earlier stages of strategy development. In summary, the review comprised:

- Comparison of SA scoring against the 17 Sustainability Objectives (a composite ‘SA Matrix’ table is included at [Appendix 2](#)^{22 23}), which indicated that PGP1, PGP2 and G1 (south of Hardwicke) performed relatively poorly in terms of meeting SA objectives, compared to the other sites.
- Whether and how well each site fits within the overall strategy. Taking account of both local site impacts and conformity with the overall development strategy for Stroud District, site G2 (Whaddon) was found to be a “poor” strategic fit and PGP2 (Moreton Valence) a “fair” fit, compared to other sites that had a “good” or “fair to good” fit.

2.4.46 Other considerations included:

- Primary constraints (such as major development within the AONB, areas at risk of flooding, direct impacts on international designations) which are incapable of being resolved;
- Significant negative impacts which are incapable of resolution or where potential resolution makes the development unviable;
- Infrastructure issues identified within the Infrastructure Delivery Plan (IDP) that are not capable of resolution;
- Deliverability or viability issues.
- There may also be site specific opportunities that only certain sites can provide to deliver positively against other Plan objectives.

2.4.47 Taking account of SA performance, fit with the development strategy, other considerations listed above and constraints and opportunities identified through public consultation, stakeholder engagement and site assessment, the 8 strategic sites from the Draft Plan and the G2 site at Whaddon were carried forward to the Pre-submission Draft Plan, while the two new potential growth points (PGP1 and PGP2) were progressed no further.

Sites carried forward



8 strategic housing sites were carried forward to meet Stroud District’s identified future needs; and 1 site (G2) was progressed with a view to ‘safeguarding’ land to meet Gloucester City’s housing needs, if required.

²² This was originally presented to the Council as part of a working draft of the SA findings in the run up the preparation of the full SA Report for the **Pre-submission Draft Local Plan** (May 2021).

²³ It should be noted that the table in [Appendix 2](#) presents the effects for all sites based on the proposed onsite uses and geographical location but not any detailed mitigation (including site design, GI, landscaping, sustainable transport measures, etc.) which might be required through allocation policies in the plan. This allows for a comparison of all sites on an equal footing given that policy wording was not worked up for the additional sites that were not proposed for allocation or safeguarding in the plan (i.e. PGP1 and PGP2). This means that there are some differences between effects recorded in the ‘SA Matrix’ table and those reported in the **SA Report for Draft Local Plan** (November 2019). Further explanation is provided in [Appendix 2](#)

2.5 Local Plan Review: Pre-submission Draft Plan stage 2020-2021

2.5.1 The final development strategy set out within the **Pre-Submission Draft Plan** (May 2021) is, in summary, a hybrid strategy based primarily upon the principle of concentrated growth at a selection of strategic urban extensions, new settlements and commercial market areas, but with some dispersal to ensure local needs can be met and settlements can respond to wider economic and demographic challenges. It takes forward the main pillars of the 2018 Emerging Strategy, refined through the Draft Plan consultation of winter 2019/20:

- 2.5.2
- Concentrating growth at the Tier 1 main towns
 - Housing and employment growth also centred at two new settlements: Sharpness and Wisloe
 - Strategic employment growth also concentrated within the rail/A38/M5 corridor
 - Canal corridor regeneration through the Stroud Valleys and at Berkeley/Sharpness
 - Modest levels of growth delivered at Tier 2 local service centres
 - Lesser levels of growth distributed to the most sustainable Tier 3 settlements (i.e. Tier 3a settlements with good accessibility to Stroud and Wotton-Under-Edge, whose growth potential is limited by environmental constraints).

2.5.3 Taking account of environmental constraints and the availability and deliverability of land surrounding the district's settlements, sites for future growth in accordance with this emerging strategy were identified at the following Tier 1-3a settlements:

- Tier 1 main towns: Cam & Dursley, Stonehouse, Stroud
- Tier 2 local service centres: Berkeley, Minchinhampton, Nailsworth and Painswick; plus additional expansion of the emerging new Tier 2 settlement of Hunts Grove; and a new planned Tier 2 settlement at Sharpness.
- Tier 3a villages: Brimscombe & Thrupp, Leonard Stanley, Frampton-on-Severn, Whitminster, Hardwicke and Kingswood; with already committed development at North Woodchester and Kings Stanley; and a new planned Tier 3a settlement at Wisloe.



The Pre-Submission Draft Plan (Regulation 19 'publication plan').

The Plan now includes a final list of site allocations, each of which is accompanied by detailed policy wording.

Sites carried forward



A total of 34 sites were progressed to proposed allocations to deliver the growth strategy and meet Stroud District's identified future needs, with a further 1 'safeguarded site' at Minchinhampton (PS05a) and 1 area identified as a potential 'Phase 2' in relation to PS36 (Sharpness).

Additionally, 1 site (G2) was progressed as an allocation to 'safeguard' land to contribute towards meeting Gloucester's unmet future housing needs.



Sites out

3 sites, which had appeared in the Draft

| | | |
|-------|--|---|
| 2.5.4 | <p>Stroud Valleys: 8 site allocations, plus 1 ‘safeguarded’ site PS05a</p> <p>Stonehouse cluster: 5 site allocations</p> <p>Cam & Dursley: 4 site allocations</p> <p>Gloucester’s rural fringe: 6 site allocations (including site G2)</p> <p>Berkeley cluster: 6 site allocations, plus future potential at PS36a</p> <p>Severn Vale: 3 site allocations</p> <p>Wotton cluster: 2 site allocations</p> <p>Cotswold cluster: 1 site allocation</p> | <p><i>Plan were not progressed as site allocations at Pre-submission stage: PS07 Nailsworth, PS13 Stroud, PS21 Cam.</i></p> |
|-------|--|---|

2.5.5 The final list of sites (and the detailed policy wording that now accompanies the allocations) is the product of a further year and a half of Review work, following the Draft Plan consultation. Detailed analysis of all Draft Plan consultation responses was undertaken during 2020 and early 2021, prior to the finalisation of the **Pre-Submission Draft Plan** in May 2021. This happened alongside work on the **Additional Housing Options** consultation; the 2020 SALA update; further work to assemble necessary evidence; and liaison with key stakeholders, statutory consultees and site promoters to ensure the proposed allocations are deliverable and that the site policies address any outstanding issues or potential impacts²⁴.

2.5.6 **Additional evidence and ongoing site assessment**

In terms of ongoing site assessment, some of the key evidence base documents generated during this phase are:

- Subsequent to October 2019’s **Interim Assessment Outputs**, the final report of the jointly-commissioned Assessment of Strategic Development Opportunities in Parts of Gloucestershire was published: **Assessment of Strategic Development Opportunities in Cheltenham Borough, Gloucester City, Tewkesbury Borough, Stroud District and Parts of Forest of Dean District** (May 2020), which confirmed initial indications that Whaddon (within Assessment Area 32) may be amongst the county’s better performing options.
- The **Traffic Forecasting Report: Stroud Local Plan Traffic Modelling Report** (March 2021): traffic impacts of the Local Plan proposals were assessed through the development of a forecast scenario that includes travel demand associated with the proposed site allocations included in the November 2019 Draft Local Plan. The forecast impacts on the highway network have been reviewed and have informed the

²⁴ In 2020, during May and June, all the proposed allocation sites were the subject of a District Ecologist site visit to health check desk top study outputs and to ground truth any change in habitat and/or biodiversity interests on these sites. Specific biodiversity mitigation comments were made to help inform individual site allocation policy requirements.



development of a package of mitigation measures, including both sustainable interventions and highway capacity improvements.

- **Development in the Cotswolds Area of Outstanding Natural Beauty Policy Assessment of Draft Allocated Sites** (May 2021). Only two proposed housing sites (PS05 in Minchinhampton and PS44 in Painswick) are located within the Cotswolds Area of Outstanding Natural Beauty (AONB), other sites having been ‘filtered out’ due to unresolvable AONB impacts and other reasons. Development proposed within the AONB is subject to specific national policy and guidance, in addition to general requirements for development. As a result, the Council produced this paper to explain these additional policy requirements and to assess whether the two proposed sites meet these requirements.
- The **Stroud Level 2 Strategic Flood Risk Assessment Final Draft Report** (May 2021) includes detailed assessments of the proposed site options, with results tabulated in **Appendix O**.
- The **Habitats Regulations Assessment of the Stroud District Local Plan Review Pre-submission Draft Plan** (May 2021). The HRA found that likely significant effects could be ruled out for the vast majority of policies and allocations. However, the screening assessment was unable to rule out likely significant effects from a number of policies/allocations, which were taken forward for appropriate assessment. Specifically, PS34 Sharpness Docks and PS36 Sharpness new settlement were flagged in relation to urban effects, loss of supporting habitat/functionally linked land and recreation; while 7 sites were flagged in relation to wastewater issues; and likely significant effects were also identified as a result of the cumulative level of growth within the Plan. These issues were able to be dealt with via existing and emerging mitigation strategies, as well as modifications and detailed requirements embedded in policy wording in the final Pre-Submission draft.
- The **Local Plan Viability Assessment** – (Working Draft, May 2021) contains an assessment of the effect of the policies to be set out in the emerging Local Plan, in relation to the potential development sites to be allocated.
- The **Sustainability Appraisal Report for the Stroud Local Plan Review: Pre-Submission Draft Plan** (May 2021), which provides a very useful final audit trail of the Council’s site selection and assessment process, alongside the independent detailed SA assessment of sites.



2.5.7 Implications of the Draft Plan consultation 2019: consultation responses

A comprehensive **Draft Plan for Consultation November 2019 Consultation Report** was produced in April 2021. A number of consultation responses suggested that some sites that had already been assessed and rejected through the SALA and/or previously consulted upon as part of the Emerging Strategy (and rejected) should be reconsidered as alternative or additional sites. The table on page 183 of the consultation report lists all these suggested “alternative” sites.

2.5.8 The Council’s response, which was drafted in early 2021 and informed by all the assessment work undertaken since the Draft Plan consultation, is set out at page 184 of the consultation report is as follows:

“The principle of development at the above settlements has been assessed as part of the generation and selection of strategy options. In addition, all sites have been subject to initial assessment through the Council’s Strategic Assessment of Land Availability (SALA) process. The results of this work have informed the preferred development strategy and the list of sites for allocation. Sites that are not considered suitable or available for allocation are set out in the SALA reports and the Sustainability Appraisal of alternative sites with reasons for not taking these sites forward.”

2.5.9 Comments about the proposed site allocations that were set out in the **Draft Local Plan for Consultation** (i.e. the “PS” sites and the “G” sites) are summarised from page 139. The Council’s response to these comments includes the identification of a small number of proposed site allocations that should be omitted (removed) from the plan, going forward:

- PS07 Nailsworth (due to landscape impacts / AONB justification)
- PS13 Stroud (due principally to land assembly / deliverability)
- PS21 Cam (progressed to planning permission: already committed development)

And some sites that should be reduced in size / boundary altered:

- PS05 Minchinhampton (reduced in size to account for landscape impacts on settlement edge / AONB justification)
- PS17 Stonehouse (increased in size to reflect full extent of promoted development site)
- PS19a Stonehouse (reduced in size to reflect land ownership / promoted site area)
- PS43 Javelin Park (increased to reflect full extent of promoted development site)



- PS44 Frampton on Severn (reduced in size to account for landscape impacts)

2.5.10 Sustainability Appraisal (SA) of sites

Published in May 2021 to accompany the Regulation 19 consultation, the **Sustainability Appraisal Report for the Stroud Local Plan Review: Pre-Submission Draft Plan** sets out the SA findings for the sites included in Pre-submission Draft Local Plan, comprising 35 site allocations and two safeguarded sites (see Chapter 5). Table 5.1 lists all of the site allocations included in the **Pre-submission Draft Local Plan** and shows how each of these relates to draft site allocations in the Draft Plan and those site options appraised as part of SA work previously undertaken for the Local Plan.

2.5.11 Moreover, the summary of SA findings for *all site options considered at each stage of plan preparation* is presented in Table A5.1 to Table A5.7 in **Appendix 5**, followed by the detailed appraisal matrices. This includes all sites appraised as part of the SA work for the **Local Plan Review Emerging Strategy Paper** (November 2018), the **Draft Local Plan for Consultation** (November 2019) and the **Additional Housing Options consultation paper** (October 2020). It should be noted that the appraisal of all the reasonable site options in **Appendix 5** was undertaken on a consistent basis, using the SA assumptions set out in **Appendix 4**, and without taking any policy requirements into account (i.e. ‘policy-off’). The detailed appraisal matrices for the site allocations are presented in Appendix 7, which takes the information provided for each site allocation within the **Pre-submission Draft Local Plan** into account (i.e. the quantum and type of development proposed and the site allocation policy text which includes specific mitigation measures and infrastructure requirements for each site).

2.5.12 The final site allocations have been taken forward for a variety of reasons. **Appendix 9** outlines the reasons for including each one (as well as the Council’s reasons for the inclusion or discounting of all reasonable alternative site options considered throughout the plan preparation). This is a very useful final audit trail of the site selection and assessment process.



Appendix 1:

SALA Accessibility Assessment Criteria.

Inform Gloucestershire (MAIDeN) were provided with the following criteria and parameters in order to calculate average travel times to key services and facilities from each SALA site, using data from the County [Accessibility Matrix](#):

| Destination | | Strategic (S) or Local (L) facility | Type of Information | Thresholds/ Tolerances | Point of Measurement |
|-------------|---|-------------------------------------|---|--|-----------------------------|
| 1 | Principal/ Other Town Centre (see Note a below) | S | For each destination, please specify: <ul style="list-style-type: none"> • Nearest facility • Bus/ walk time • Walking distance (on urban path network) • Drive distance (as travelled by road) | <ul style="list-style-type: none"> • Bus/ walk time thresholds: R = > 30 mins A=15 – 30 mins G = < 15 mins • Assume travel on a Tuesday • Include time to walk to bus stop at both ends of journey, with max walk at each end of 400m • If distance to destination less than 400m, time will be all walking • Walk = 4.8km/hr • Existing bus stops only | Centroid (for all sites) |
| 2 | Key Employment Site (see Note b below) | S | | | |
| 3 | Library | S | | | |
| 4 | Secondary school | S | | | |
| 5 | Bank/ Building Society | S | | | |
| 6 | Minor Injury Unit/ A&E | S | | | |
| 7 | Leisure centre/pool | S | | | |
| 8 | Rail station | S | | | |
| 9 | District/ Local or Neighbourhood Centre (see Note c below) | L | | | |
| 10 | Supermarket | L | | | |
| 11 | Post Office | L | | | |
| 12 | Primary School | L | | | |
| 13 | Doctor | L | | | |
| 14 | Community Centre/ Hall | L | | | |

NOTES

- Select nearest location identified as a Principal or Other Town Centre in the Stroud District Local Plan (SDLP) CP12 (Stroud, Dursley, Stonehouse, Nailsworth, Wotton under Edge), Gloucester Primary Shopping Area (*S8) or Thornbury Town Centre.
- Select nearest location identified as a Key Employment Site by SDLP Delivery Policy EI1 (EK1 – 37), Waterwells employment site (*EC1) or Brockworth major employment site (**EMP1).
- Select nearest location identified as a District, Local or Neighbourhood Shopping Centre by SDLP CP12 (Berkeley, Cam, Minchinhampton, Painswick, Cainscross, Hunts Grove, Kings Stanley, Whitminster, West of Stonehouse, Kingshill, Woodfields, Brimscombe, Manor Village, Abbeymead District Centre (*S10), Quedgeley District Centre (*S10), Matson Avenue Local Centre and Windsor Drive Local Centre (*S12/ S13), Brockworth.

*From Gloucester City Local Plan 2002 Deposit Draft

**From Tewkesbury Borough Local Plan to 2011



Appendix 2:

SA scoring of strategic housing sites and potential growth points

The table over the page shows the composite SA scoring matrices of the eight strategic housing sites included in the 2019 **Draft Plan for Consultation** and the two potential growth points identified in the 2020 **Draft Plan | Additional housing options** paper. The appraisal of the strategic sites allocated in the Draft Plan was originally presented in the **Sustainability Appraisal Report for the Stroud District Local Plan Review – Draft Plan** (November 2019). The appraisal of additional growth point options PGP1 and PGP2 was originally presented in the **Sustainability Appraisal Findings for the Stroud Local Plan Review Additional Housing Options** (October 2020).

This composite table allows for a direct comparison of the sustainability effects of all reasonable potential strategic housing sites and potential growth points. Other potential strategic sites considered as part of the plan making process had previously been filtered out through the SALA and earlier stages of strategy development.

It should be noted that the table over page presents the effects for both the allocated Draft Plan strategic sites and the additional potential growth point sites on the basis of the proposed uses and geographical location but not any detailed mitigation (including site design, GI, landscaping, sustainable transport measures, etc.) which might be required through allocation policies. This allows for a comparison of all of these sites on an equal footing, given that policy wording was not worked up for the additional potential growth point sites identified in 2020 (i.e. PGP1 and PGP2). This means there are some minor differences between the SA effects recorded for the proposed strategic allocation sites in the Draft Plan in the **Sustainability Appraisal Report for the Stroud District Local Plan Review – Draft Plan** (November 2019) (and in the May 2021 **Sustainability Appraisal Report for the Stroud Local Plan Review: Pre-Submission Draft Plan**²⁵) and the summary of effects recorded over the page, given that the effects shown below have not taken into account the mitigation requirements contained in the planning policy in the Draft Local Plan.

²⁵ There are some differences between the effects recorded in the SA Report for the Draft Local Plan (November 2019) and for the Pre-submission Draft Local (May 2021) where the understanding of the exact uses to be provided on site and/or the policy requirements included in the text of those versions of the plan have been updated.



| Table 3 SA Objectives | SA 1: Housing | SA 2: Health | SA 3: Social inclusion | SA 4: Crime | SA 5: Vibrant communities | SA 6: Services and facilities | SA 7: Biodiversity/ gooddiversity | SA 8: Landscapes/ townscapes | SA 9: Historic environment | SA 10: Air quality | SA 11: Water quality | SA 12: Flooding | SA 13: Efficient land use | SA 14: Climate change | SA 15: Waste | SA 16: Employment | SA 17: Economic growth |
|------------------------------------|------------------|--------------|---------------------------|-------------|------------------------------|----------------------------------|--------------------------------------|---------------------------------|-------------------------------|-----------------------|-------------------------|--------------------|---------------------------------|-----------------------------|-----------------|----------------------|------------------------------|
| Stonehouse | | | | | | | | | | | | | | | | | |
| PS19 Stonehouse NW | ++ | ++/- | 0 | 0 | + | ++ | -? | -? | 0 | ++/- | --? | - | --? | 0 | 0 | ++ | ++ |
| Cam | | | | | | | | | | | | | | | | | |
| PS24 Cam NW | ++ | ++/- | 0 | 0 | + | ++ | -? | -? | 0 | -- | --? | - | -- | 0 | 0 | ++ | ++? |
| PS25 Cam NE | + | ++/- | 0 | 0 | + | ++ | -? | -? | 0 | -- | --? | - | --? | 0 | 0 | ++ | ++? |
| Hardwicke and Hunts Grove | | | | | | | | | | | | | | | | | |
| PS30 Hunts Grove Ext. | ++ | ++/- | 0 | 0 | + | +/- | -? | ? | 0 | -- | 0 | - | -- | 0 | 0 | + | ++? |
| G1 South of Hardwicke | ++ | ++/- -? | 0 | 0 | + | + | --? | -? | -- | -- | 0 | -- | -- | 0 | 0 | + | ++? |
| Whaddon | | | | | | | | | | | | | | | | | |
| G2 Whaddon | ++ | ++/- | 0 | 0 | + | ++ | -? | -? | - | -- | 0 | -- | -- | 0 | 0 | + | ++? |
| Newtown and Sharpness | | | | | | | | | | | | | | | | | |
| PS34 Sharpness Docks | + | ++/- -? | 0 | 0 | + | + | --? | -? | +/-? | -- | 0 | ++ | + | 0 | ++? | ++? | ++? |
| PS36 Sharpness | ++ | ++/- -? | 0 | 0 | + | + | --? | --? | - | ++/- | 0 | -- | --? | 0 | 0 | ++ | ++? |
| Wisloe | | | | | | | | | | | | | | | | | |
| PS37 Wisloe | ++ | ++/- | 0 | 0 | + | + | -? | -? | 0 | -- | --? | - | -- | 0 | 0 | ++ | ++ |
| Whitminster/Moreton Valance | | | | | | | | | | | | | | | | | |
| PGP1 Grove End Farm | ++ | ++/- | 0 | 0 | + | ++ | -? | --? | - | --? | --? | - | -- | 0 | 0 | ++ | ++? |
| PGP2 Moreton Valance | ++ | ++/- | 0 | 0 | + | ++ | -? | --? | -- | --? | 0 | - | -- | 0 | 0 | ++ | ++? |

Key to SA scores

| | |
|------|--|
| ++ | Significant positive effect likely |
| ++/- | Mixed significant positive and minor negative effects likely |
| + | Minor positive effect likely |
| +/- | Mixed minor effects likely |
| - | Minor negative effect likely |
| --/+ | Mixed significant negative and minor positive effects likely |
| -- | Significant negative effect likely |
| 0 | Negligible effect likely |
| ? | Likely effect uncertain |



Bibliography: list of evidence base documents referenced

Evidence base documents are included in the Stroud District Local Plan Examination Library, and can be accessed via our Local Plan Review web pages www.stroud.gov.uk/localplanreview

The following documents are referenced in this Topic Paper:

Strategic Assessment of Land Availability (SALA):

Strategic Assessment of Land Availability (SALA) Methodology, February 2016.

Index of 2016 Call for Sites submissions

2017 SALA Report of Findings, May 2017

Index of additional sites SALA 2018

2018 SALA New Sites Update Report, July 2018

Index of additional sites SALA 2018

2019 SALA New Sites Update Report, November 2019

Index of additional sites SALA 2018

2020 SALA New Sites Update Report, October 2020

Heritage impacts (SALA):

SALA Heritage Impact Appraisal (May 2017)

SALA Heritage Impact Appraisal (May 2018)

SALA Heritage Impact Appraisal (September 2019)

SALA Heritage Impact Appraisal (October 2020)

Transport:

2017 SALA Transport Accessibility Assessment (unpublished), October 2016

2018 SALA Transport Accessibility Assessment (unpublished) July 2018

2019 SALA Transport Accessibility Assessment (unpublished) October 2019

2020 SALA Transport Accessibility Assessment (unpublished) October 2020

Stroud Local Plan Review - Strategy Options Transport Discussion Paper (July 2018)

Traffic Forecasting Report: Stroud Local Plan Traffic Modelling Report (March 2021)



Landscape and AONB matters:

Stroud District Landscape Sensitivity Assessment, December 2016

Evaluation of Site Landscape and Visual Issues Report October 2019

Development in the Cotswolds Area of Outstanding Natural Beauty Policy Assessment of Draft Allocated Sites (May 2021).

The Assessment of Strategic Development Opportunities in Parts of Gloucestershire:

Assessment of Strategic Development Opportunities in Parts of Gloucestershire: Interim Assessment Outputs, published October 2019

Assessment of Strategic Development Opportunities in Cheltenham Borough, Gloucester City, Tewkesbury Borough, Stroud District and Parts of Forest of Dean District (May 2020),

Local Plan Review / consultation:

Issues and Options Paper, October 2017

Issues and Options Consultation Report (February 2018)

Emerging Strategy Consultation Paper (November 2018)

Emerging Strategy Consultation Report (May 2019)

Draft Plan for Consultation in November 2019

Draft Plan for Consultation November 2019 Consultation Report April 2021

Draft Plan | Additional housing options Consultation Paper October 2020

Local Plan Review: Additional Housing Options Consultation Report (April 2021);

Pre-Submission Draft Plan in May 2021

Local Plan Review: Developing a preferred strategy (Planning Review Panel working paper) (revised March 2018)

Sustainability Appraisal:

Sustainability Appraisal Findings for the Stroud Local Plan Review Site Options, August 2018

Sustainability Appraisal Report for the Stroud District Local Plan Review: Emerging Strategy Paper November 2018

Sustainability Appraisal Report for the Stroud District Local Plan Review – Draft Plan (November 2019)

Sustainability Appraisal Findings for the Stroud Local Plan Review Additional Housing Options (October 2020)

Sustainability Appraisal Report for the Stroud Local Plan Review: Pre-Submission Draft Plan (May 2021)



Viability:

Local Plan Viability Assessment – (Working Draft, May 2021)

Habitats Regulations Assessment:

Habitats Regulations Assessment of the Stroud Local Plan at Emerging Strategy Stage
(November 2018)

Habitat Regulations Assessment of the Stroud Local Plan at Draft Plan Consultation Stage,
November 2019.

Habitats Regulations Implications and considerations relating to the Stroud Local Plan Review
Draft Plan Additional housing options consultation (October 2020)

Habitats Regulations Assessment of the Stroud District Local Plan Review Pre-submission Draft
Plan (May 2021).

Strategic Flood Risk Assessment:

The **Stroud Level 2 Strategic Flood Risk Assessment (SFRA)** (draft report, November 2019)

Stroud Level 2 Strategic Flood Risk Assessment Final Draft Report (May 2021)

Settlement role and function:

Stroud District Settlement Role and Function Study 2014

Stroud District Settlement Role and Function Study Update 2018 May 2019

