

# EXAMINATION OF THE STROUD DISTRICT LOCAL PLAN REVIEW

## INSPECTORS' MATTERS, ISSUES AND QUESTIONS

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### **Introduction**

These matters, issues and questions relate to the examination of the Stroud District Local Plan Review (the Plan). All documents can be found on the examination webpage on the Council's website.

Further information about the examination, the conduct of the hearing sessions and the format of any further written statements is provided in the Inspectors' Guidance Note. A further note on the conduct of the virtual hearing sessions will be published in due course.

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### **Matter 1 Compliance with statutory procedures and legal matters**

#### ***Issue 1.1 – Has the Council met the statutory duty to cooperate as set out under Sections 20(5)c and 33A of the Planning and Compulsory Purchase Act 2004?***

1. Has the Council submitted robust evidence to demonstrate that the duty to cooperate has been met? In particular:
  - a. Have all relevant strategic matters been identified and has the process for identification been robust? What actions have been taken to address these matters and are there any outstanding concerns?
  - b. Has the Council carried out effective engagement with neighbouring local authorities and other prescribed bodies on all relevant strategic matters and have all outcomes been adequately evidenced? Is there robust evidence to support the cooperation activities that have taken place?
  - c. Have any unmet needs been appropriately considered when preparing the Plan?

***Issue 1.2 – Has the Plan been prepared in accordance with other legal and procedural requirements?***

Sustainability appraisal (SA)

2. Paragraph 32 of the National Planning Policy Framework (the Framework) indicates that local plans should be informed throughout their preparation by a SA that meets the relevant legal requirements.
  - a. Has the SA methodology been robust? Are the key sustainability issues identified comprehensive and are they suitably reflected in the SA objectives and sub-objectives?
3. Does the SA adequately consider the likely significant effects of reasonable alternatives where these exist, including in respect of the scale of housing and employment provision and the balance between them?
4. Has appropriate account been taken of the Cotswolds Area of Outstanding Natural Beauty (AONB) and other natural and historic environment designations within the appraisal and the alternatives assessed?
5. Have unreasonable alternatives been appropriately considered and have adequate reasons been given as to why these have not been selected?
6. Is it clear how the SA has informed judgements about future growth within the Plan and the choice of spatial strategy? Does it support the spatial strategy or is there anything in the SA which indicates that changes should be made to the Plan?
7. Overall, does the SA adequately assess the environmental, social and economic effects of the Plan in accordance with legal and national policy requirements?

Habitats Regulations Assessment (HRA)

8. Does the HRA meet the legal requirements for Appropriate Assessment in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended)?
9. Does the HRA adequately address whether the Plan would adversely affect the integrity of relevant European sites either alone or in combination with other plans or projects? Are the HRA conclusions robust?
10. Have all HRA recommendations been suitably reflected in the Plan?

Consultation

11. Has the Plan been prepared in accordance with the Council's Statement of Community Involvement and statutory consultation requirements? Has all relevant and available evidence been made available for consultation, at the various stages of Plan preparation?

### Other regulatory and procedural requirements

12. Regulation 8(5) of the Town and Country Planning (Local Plan) (England) Regulations 2012 requires any new plan to list the policies in existing adopted plans which it is intended to supersede. The Plan before us appears to be a review of the existing adopted Stroud Local Plan (2015). Is the Plan proposing to supersede all the policies in this existing adopted plan and if so is this clearly set out? Is the Plan proposing to supersede any other adopted plans? Is there a list of policies proposed to be superseded, as required by the Regulations?
13. The Plan identifies 'Core Policies' and 'Delivery Policies'. Paragraph 21 of the National Planning Policy Framework (the Framework) requires plans to 'make explicit which policies are strategic policies, and that these should be limited to the strategic priorities for the area and any relevant cross-boundary issues. Does the Plan accord with this requirement? Are strategic and non-strategic policies clearly distinguishable?
14. In relation to the Public Sector Equality Duty, we note that the Council has submitted an 'Equalities Impact Assessment Form' dated September 2021. Are the positive and neutral impact findings of this assessment reasonable? Is it clear how the Plan seeks to ensure that due regard is had to the three aims expressed in s149 of the Equality Act 2010, in relation to those who have a relevant protected characteristic?

## **Matter 2 Spatial Strategy and site selection methodology**

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

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

#### **Vision and objectives**

1. Does the Plan set out a suitably positive and realistic vision for the future development of the District as a whole?
2. What is the purpose of the 'Mini Visions' referred to in Core Policy CP4 and set out under each sub-area of the Plan? Do Maps 5-12 within the Plan reasonably reflect the spatial visions for each sub-area? Are these visions justified and do they adequately reflect the overarching Plan vision?
3. Have the seven strategic objectives (S01, S01a and S02-S06), included in Chapter 2 of the Plan, been positively prepared, are they justified and are they consistent with the overall vision and the priority issues facing the District?

#### **Spatial strategy**

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

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

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

4. Is the spatial strategy justified by robust evidence and does it promote a sustainable pattern of development within the District, in accordance with paragraph 11 of the Framework? Is the Council decision as to why this development distribution option was selected, sufficiently clear?
5. Is the reliance on the delivery of most of the growth on a relatively small number of strategic development sites, including two new settlements, justified? How

were the locations for the two new settlements at Sharpness and Wisloe identified and was the process robust?

6. Is the strategy consistent with the settlement hierarchy and is the scale of development proposed at relevant settlements justified?
7. Has it been clearly demonstrated how the SA, HRA, infrastructure, viability and other relevant evidence have influenced the location of development and the overall strategy during plan-making?
8. Does the spatial strategy make effective use of previously developed land and is this based on a robust and up-to-date evidence base?
9. Do Core Strategy Policies CP2 and CP4 take a sufficiently strategic approach to clearly define the development strategy for the District as a whole? Should consideration be given to a new policy encompassing the elements of the District wide spatial strategy that are set out in chapter 2 of the Plan, such as the key development strategy headlines?
10. Paragraph 23 of the Framework states that broad locations for development should be located on a key diagram. Can the Council clarify whether Map 3 (page 24) in the Plan is the key diagram?
11. Will the spatial strategy promote the vitality of town centres in the District and support a prosperous rural economy, as required by national policy?
12. Is the use of the term 'cumulative total' in Core Policy CP2 clear? Or does it imply total dwellings for each settlement? Is this consistent with the site allocation policies which uses terms such as 'approximately' when defining dwelling numbers?
13. Core Policy CP4 states that all development proposals shall accord with the mini visions, have regard to the guiding principles and shall be informed by other relevant documents. It also identifies that development will be expected to integrate into the neighbourhood, place shape and protect or enhance a sense of place and create safe streets, homes and workplaces.
  - a. Is the approach in the policy justified and effective? Is its intention clear and is it consistent with national policy?
  - b. Does the policy set out clear development requirements, or are these more clearly defined in other Plan policies? If so, why is there duplication?
  - c. Reference is made in the policy's supporting text, at paragraph 9.22, to the National Design Guide. How does the policy relate to the updated 2021 version of this national guidance?
14. Overall, will the spatial strategy meet the overarching strategic objectives and achieve the Council's vision?

## Settlement hierarchy

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

15. Core Policy CP3 states that proposals for new development should be located in accordance with the hierarchy. The Council indicates this will assist in delivering sustainable development, by concentrating growth in those settlements that already have a range of services and facilities.
  - a. Has the settlement hierarchy been derived using a robust and justified process and is it supported by credible evidence?
  - b. It has been suggested by representors that some settlements (including Minchinhampton, Painswick, Chalford and Kingswood) should be re-categorised within the hierarchy. Does the settlement hierarchy accurately reflect the role and function of different settlements within the District and are the settlement categorisations justified by robust and up-to-date evidence?
16. New settlements are proposed within the Plan, at Sharpness and Wisloe, but are not included in the settlement hierarchy. The approach in the Plan is to define these as settlements through a future Local Plan Review. Yet reference is made to 'anticipated' local centres within these settlements within Core Policy CP12.
  - a. Why are these proposed new settlements not in the hierarchy?
  - b. If housing and employment growth will be centred at these new settlements, how will the distribution of growth in the Plan reflect the settlement hierarchy if they are not included within it?
  - c. How will development proposals at these locations be dealt with where several policies in the Plan refer to the settlement hierarchy in their application?
17. Core Policy CP3 lists Hunts Grove as being a tier 2 local service centre (anticipated). Yet paragraph 2.9.19 states that Hunts Grove is not included within the settlement hierarchy. Can the Council clarify this and also explain why Hunts Grove is 'anticipated' as a tier 2 settlement?
18. Have implications of the larger strategic allocations on the existing settlements and their place within the settlement hierarchy been robustly assessed?
19. Very small settlements are not included in the hierarchy and instead are considered to be part of the countryside. Is this approach justified?
20. Settlement development limits (SDL) or boundaries have been identified. Appendix A details proposed changes to some existing SDL on the policies map.
  - a. Is it clear how SDL have been defined and are they justified and effective?

- b. Are the reasons for the proposed changes to the SDL clearly explained? Do they just incorporate completed development into the settlement boundaries? Do any of the proposed changes involve land within the AONB?
  - c. It appears that the SDL proposed changes do not extend to include some committed development sites currently under construction and the proposed site allocations within the Plan. Whilst some explanation has been provided in the Council's response to the representations, we remain concerned that this approach would create policy conflicts for decision-makers when determining future planning applications for these sites, as they would be outside the defined SDL. Can the Council provide more detailed clarification on why they consider their approach is sound?
  - d. Are any changes to the SDL for some settlements, as suggested through the representations, necessary for soundness?
21. The hierarchy indicates that for Tiers 1, 2 and 3a further development may 'exceptionally' be permitted adjacent to the SDL, subject to meeting other Plan policies. For Tiers 3b and 4 the policy indicates that there could be scope for some or very limited development on land adjoining settlements, to meet specific local needs. Figure 3 in the Plan (pages 56 and 57) lists the types of development that could be permitted adjoining SDL, for each settlement tier.
- a. Is development outside the proposed SDL necessary to meet identified needs and if so, why are site allocations in these locations not being proposed or boundaries moved to accommodate this? Or will such development be 'exception sites'?
  - b. Is the Plan clear as to how decision-makers would determine whether the location of proposed development would be 'adjacent to settlements', 'edge of settlements', 'adjoining SDL' or 'immediately adjoining'?
  - c. Is the purpose of Figure 3 in the Plan clear? Does it form the supporting text to Core Policy CP3 or does it form part of the policy? Is it clear to developers and decision-makers as to what type and scale of development may be acceptable adjoining the SDL and when the exceptions would apply? How have these been determined and are they justified and consistent with other Plan policies e.g. affordable housing?
22. The text on page 23 of the Plan also states that some limited development on small and medium sites immediately adjoining SDL for tiers 1-3 will be allowed, to meet specific identified local development needs.
- a. What is the status of this text and is it consistent with the policy wording in Core Policy CP3? If not, are any changes necessary to remove any ambiguity and ensure policy effectiveness?
  - b. Is it clear how local needs will be defined and what will be the criteria for this?

23. Paragraph 2.3.12 of the Plan also sets out support for some development at tier 3b, 4a and 4b settlements of small sites up to 9 dwellings outside of defined settlement limits, provided that the policy is supported by the local community.
  - a. Which policy is being referenced here? Is it Core Policy CP3, Delivery Policy DHC2 or some other policy?
  - b. How will the Council determine that the policy is supported by the local community? Will this be at the point of adoption? If so, what is the purpose of this supporting text?
  
24. Core Policy CP3 does not specify an 'up to 9 dwellings' limit, though Delivery Policy DHC2 does.
  - a. Why has a limit of 9 dwellings been identified for these tiers? Is this justified by robust evidence? Reference is made to the 9 dwelling limit in Figure 3 but this does not appear to form part of Core Policy CP3. Is this correct?
  - b. In addition Figure 3 also states that for these tiers such development would be 'not exceeding a 10% cumulative increase in the settlement's total dwellings during the Plan period'. How will this be assessed and is this approach justified? Should this be included in the policy wording or does Figure 3 form part of the policy?
  - c. How does Core Policy CP3 relate to Delivery Policy DHC2? Are the policies consistent or is there unnecessary duplication and/or unclear requirements?
  
25. The text on page 23 of the Plan also states that limited housing within the AONB will be supported to meet needs arising from within the AONB.
  - a. Is this clearly set out in policy and if so, how will this be assessed by a decision-maker determining future planning applications?
  - b. Is this approach consistent with paragraphs 176 and 177 of the Framework in regard to the AONB?
  
26. Overall, is the settlement hierarchy and how it relates to the development strategy clearly explained within the Plan and is the approach justified, effective and consistent with national policy?

#### Site selection methodology

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

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



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

27. Is the site selection methodology justified and does it accord with national planning policy and guidance?
28. Has the site selection process been suitably informed by relevant studies/assessments and site constraints, and has it included a robust assessment of development impacts?
29. Has the sequential test, and exception test where necessary, been correctly applied in the assessment of flood risk (including surface water flooding) for the selection of potential development sites? Is this adequately evidenced for all sites as part of the site selection process? Do any of the sites in the Plan fall within, wholly or partially, Flood Zones 2 or 3?
30. Overall, has the process robustly identified and assessed all relevant sites?

### **Matter 3 Housing need and requirement**

*(Please note that housing needs for specific groups in the community (including older people and gypsies, travellers and travelling showpeople), and questions relating to affordable housing and overall housing supply and provision (including site allocations and delivery), are set out under later matters)*

***Issue 3 – Is the identified housing need supported by robust and credible evidence, justified and consistent with national policy? Is the Plan’s housing requirement of at least 12,600 dwellings justified and consistent with national policy? Is the Plan’s approach to addressing some unmet housing needs for Gloucester soundly based?***

#### Housing need

The housing need for the District has been established through the Gloucestershire Local Housing Needs Assessment 2020 (LHNA) (EB10) using the standard methodology, as defined in national planning policy and guidance. This sets a baseline of 496 dwellings per annum (dpa) which, when adjusted to take account of affordability, results in an uncapped minimum local housing need of 652 dpa (13,040 dwellings over the plan period).

As identified in the LHNA, once the standard method cap is applied, the minimum number generated reduces to 638 dpa (at least 12,800 dwellings over the 20 year plan period).

The Plan states that the capped standard method figure is a minimum of 630 dpa (at least 12,600 dwellings over the plan period).

1. The capped standard method minimum figure in the Plan at 630 dpa is lower than the 638 dpa figure set out in the LHNA. Can the Council point us to the document that sets out the reasoning for this please?
2. The PPG advises that ‘The cap reduces the minimum number generated by the standard method, but does not reduce housing need itself. Therefore strategic policies adopted with a cap applied may require an early review and updating to ensure that any housing need above the capped level is planned for as soon as is reasonably possible.’
  - a. As the LHNA identifies a higher housing need above the capped level, what arrangements do the Council have for ensuring that this is planned for as soon as is reasonable? Is this clearly set out in the Plan?
  - b. Whilst our queries on housing provision are set out under a later matter, we note that the evidence suggests that housing supply, as at 2020, equates to 14,935 dwellings. On this basis, has consideration been given to a higher level of housing need being set out in the Plan and could this realistically be delivered during the plan period?

## Gloucester's unmet housing need

The Plan, at paragraph 2.5.5, states that it 'addresses unmet needs from neighbouring Gloucester by allocating a site for 3,000 dwellings at Whaddon for delivery by 2040'. Core Policy CP2 identifies the location and proposed number of dwellings and Strategic Site Allocation Policy G2 states that the site is 'safeguarded' and includes specific requirements. The policy is subject to the site being required to meet Gloucester's housing needs and providing the location accords with the 'approved strategy' for the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Review (JCS Review), which is currently in preparation.

The draft Strategic Housing Matters Statement of Common Ground (SOCG) on electronic page 71 of document EB3 provides some context to the reasons for the allocation to meet potential unmet needs, which is mainly due to different plan production timescales.

Whilst our more detailed questions on Strategic Site Allocation Policy G2 are set out under later matters, our general queries on meeting Gloucester's unmet housing needs are as follows:

3. What progress has been made to finalise the above SOCG and submit a signed version?
4. Based on the submitted evidence are we correct in our understanding that Gloucester City's housing needs, housing land supply and level of any unmet housing needs have yet to be confirmed and examined? How far have these assessments progressed?
5. What stage is the JCS Review currently at and what is the timetable for its production and examination?
6. The Plan states that the 2017 adopted JCS recognises that 'Gloucester City has a good supply of land for the short to medium term that will enable it to meet its requirements to at least 2028/9'. National policy states that local plan policies are required to be reviewed within five years of adoption of a plan. In this context, and if the level of any unmet housing need is uncertain at this stage, why does the Council consider it necessary to allocate/safeguard land that may or may not be required?
7. Provision for designating safeguarded land is set out in paragraph 143 of the Framework and is in relation to the removal of land from the Green Belt. The site proposed to be safeguarded under Strategic Site Allocation Policy G2 is not in the Green Belt. The safeguarding of land would normally imply that, at least in principle, the development of the site was justified. But the caveats in the policy mean that determining whether the site is justified or not, will be determined at a later date. Yet confusingly the site is also identified within a strategic site allocation policy. Can the Council clarify its position on this and explain how its approach in the Plan in this regard, is justified, effective and consistent with national policy?

8. When will it be determined whether the site at Whaddon would be required and when it would be consistent with the 'approved strategy' of the JCS Review? Would this be at the point of adoption of the JCS Review? Does the Plan clearly set this out and does this justify the need to allocate/safeguard this site now?
9. Overall, is the inclusion of land at Whaddon to meet the needs of Gloucester justified, effective and consistent with national policy?

### Housing requirement

The PPG advises that the standard method identifies a minimum annual housing need figure, but states that it 'does not produce a housing requirement figure.' The Plan, through Core Policy CP2, states that 'Stroud District will accommodate at least 12,600 additional dwellings.....to meet the needs of the District for the period 2020-2040'. This is the same amount as the capped standard method figure for need set out in the Plan.

10. Is the identified housing requirement of at least 12,600 additional dwellings justified and consistent with national policy? Does the Plan clearly set out in policy both the overall housing requirement for the plan period as a whole, and the requirement that applies in each year of the plan period?
11. In a similar vein to question 2 above, has consideration been given to a higher housing requirement to assist in meeting identified housing needs above the cap? Is this a realistic approach?
12. The LHNA considers that the jobs growth forecast aligns with the resident worker forecasts, so there is no need to increase the housing requirement above the minimum figure identified by the standard methodology. Is this approach justified?
13. The Plan states that there is an unadjusted need for affordable housing of 424 dpa. This appears to have been established through the LHNA, which identifies a total affordable housing need of 8,476 dwellings in the District for the period 2021-2041. Is our understanding correct?
14. The evidence, including the Council's Topic Paper EB8, further explains that as the identified housing need figure incorporates a significant uplift, and there is additional supply proposed within the Plan, to provide flexibility, this 'is sufficient to deliver affordable housing without increasing the housing requirement'. Whilst our detailed questions on the affordable housing policy are set out under a later matter, is this approach justified and will the housing requirement in the Plan deliver the identified affordable housing need? If not, what is the Council proposing to do about this, particularly as paragraph 4.21 of the Plan states that affordability is expected to worsen over the plan period?
15. The housing requirement of 'at least 12,600' dwelling housing requirement does not include the 3,000 dwelling contribution that the Plan is proposing to help meet Gloucester's unmet housing needs. Notwithstanding our previous questions on the soundness of meeting unmet needs, why does this contribution not form part

of the housing requirement figure? Is this approach consistent with national policy and guidance?

16. To provide clarity for future decision-makers the Plan should clearly identify and distinguish between the objectively assessed housing need, the standard method figure, the housing requirement and the level of provision in the housing requirement to help meet the unmet needs of Gloucester City. Does the Plan do this?
17. Paragraph 65 of the Framework states that 'strategic policies should also set out a housing requirement for designated neighbourhood areas....'. The Council's evidence details that there are 17 neighbourhood areas within the District with 10 made Neighbourhood Plans (NP). The Council's Topic Paper on Neighbourhood Planning (EB5) explains that as no made or emerging NP allocate housing sites, housing requirements are to be set through site allocations in the Plan currently under our examination.
  - a. Is this approach consistent with national policy, particularly with regard to paragraphs 65-67 of the Framework?
  - b. Is it clear which sites are within each defined neighbourhood area and what the proposed housing requirements in these areas would be?
  - c. What are the implications of these proposed housing allocations on the designated neighbourhood areas and any emerging or made NP?

## **Matter 4 Employment needs and requirement**

*(Please note that questions relating to employment land supply and provision, including site allocations and delivery, are set out under later matters)*

### ***Issue 4 – Are the identified employment needs supported by robust and credible evidence, justified and consistent with national policy? Is the Plan’s proposal to accommodate 79 ha of employment land soundly based?***

The economic need for the District has been established through the Gloucestershire Economic Needs Assessment (2020) (ENA) (EB29), which examined a range of scenarios for future economic growth. The ENA recommends that the amount of additional employment land needed should be between 62 and 72 ha for the plan period, to accord with the highest two scenarios: a scenario based upon the expected labour supply and a slightly higher labour demand growth scenario based upon supporting growth in the key local industrial strategy sectors.

Within the Plan (page 37) the Council suggests that, once commitments from outstanding planning permissions (as at April 2020) and potential losses are factored in, the minimum residual employment land requirement for the plan period is a range between 50.9 and 60.3 ha.

1. Were the scenarios used in the ENA based on robust evidence and are the economic growth assumptions justified? Is there reasonable alignment with the housing need assessment?
2. Is use of the higher needs scenarios justified? Have clear reasons been given as to why lower economic needs figures would not be appropriate?
3. What progress has been made on the delivery of the employment land commitments (as at April 2020) of 52.1 ha? Can the Council provide an update on this in the form of a site schedule? Will all of these committed sites be delivered during the plan period?
4. Potential losses of ‘B’ uses over the plan period is calculated as 40.6 ha. This is based on an average 2.03 ha loss per year since 2006. Is this potential future loss a realistic forecast or has it been under or over-estimated?
5. The minimum employment land requirement range of 50.9 to 60.3 ha does not appear to be set out in policy. Instead Core Policy CP2 states that ‘Stroud District will accommodate....at least 79 hectares of additional employment land to meet the needs of the District for the period 2020-2040....’, which is above the minimum requirement. This higher figure appears to be based on the proposed new employment land supply comprising eight strategic development site allocations. Whilst our questions on these site allocations and overall employment land supply are set out under later matters, is the provision of a higher level of new employment land than is necessary to meet the minimum requirement justified by robust evidence? Can the Council clarify the percentage of additional employment land being proposed above the identified requirement and explain the reasons for this?

## **Matter 5 New settlements at Sharpness and Wisloe**

***Issue 5 – Are the proposed new settlement allocations at Sharpness and Wisloe justified, effective and consistent with national policy?***

Strategic Site Allocation Policy PS36 Sharpness new settlement

The policy proposes the allocation of land south and east of Newtown and Sharpness for a new mixed use garden community. This includes up to 2,400 dwellings by 2040 and 10ha of employment land. The policy requires a range of strategies and plans to be developed that will require approval by the Council. This includes 25 criteria to be addressed.

1. Does the proposed allocation meet the vision, spatial strategy and strategic objectives set out in the Plan? Does the policy ensure that these objectives will be met?
2. Does the evidence adequately demonstrate that the proposal will accord with the sustainable ethos of garden communities?
3. Is the policy aim, of providing a new self-contained garden community settlement, viable and realistic? Has this been robustly demonstrated and is the development, as envisaged in the Plan, likely to be achieved during the plan period?
4. In relation to infrastructure:
  - a. Does the policy clearly identify what infrastructure is necessary to support the delivery of the allocation? Will it be delivered at the right time and in the right place? How will this be achieved?
  - b. Has the impact of the new settlement on the surrounding road network, including nearby motorway junctions, been adequately assessed? Can any impacts be mitigated and if so, how and when? Is this feasible? Is the policy sufficiently positively worded in this regard, for example with reference to M5 junction 14.
  - c. The policy refers to a new railway station being delivered on the Sharpness branch line as part of the development.
    - i. What is the status of this project and is the delivery of the site allocation dependent on this coming forward?
    - ii. What level and frequency of rail service is proposed and is this supported by Network Rail and relevant service providers?
    - iii. Has funding been identified to support the delivery of this scheme?
    - iv. What are the proposed timescales for its delivery and would it be in time to support the new settlement?

- d. Is the proposed new rail link (on the Bristol-Birmingham mainline) and express coach services deliverable and viable and have funding sources been identified for these schemes? What is the timetable for delivery for these projects and will they be delivered in time to support the allocation? The policy refers to the coach link being required at an early stage in the development, is this viable? Have discussions taken place with the relevant infrastructure providers taken place (such as Network Rail) and do they support the projects? Has funding been identified? Has capacity been identified on the Bristol-Birmingham mainline to accommodate additional passenger traffic?
  - e. The Sustainable Transport Strategy (STS) lists a number of interventions for the site that will need to be incorporated into its design and layout and be delivered at an early stage. For instance, it identifies that sustainable transport movements should be prioritised over vehicle movements by providing high-quality and accessible cycling and walking routes, which connect to Quedgeley West Business Park and local community facilities on Green Lane. Are these requirements and the timing of their delivery sufficiently clear from the wording of the policy? Will sufficient suitable and available sustainable transport links connect the site with the surrounding area?
5. Has the effect of the development on the existing Sharpness Waste Water Treatment Works been adequately assessed? Will capacity improvement be required and if so, how will this be delivered and funded?
  6. The text accompanying the policy acknowledges the site is near to areas subject to flooding and that the disposal of surface water flooding will need careful consideration to ensure that neither the development or adjoining areas are at risk of flooding or exacerbating existing areas of flooding. How will this be achieved?
  7. Does the policy sufficiently ensure that the risk to existing flood risk management assets (due to climate change, rising sea levels and natural deterioration) will be addressed?
  8. The policy refers to the development having ultrafast broadband to homes and businesses with top average speeds of 1Gbps. As this requirement would be delivered by a third party (Open Reach) and would be outside the control of the developers, is it justified and effective?
  9. Has the potential of canal towpath degradation due to increased usage by future occupants of the development been considered? How would this issue be mitigated and addressed if necessary?
  10. The text accompanying the policy lists a number of mitigation measures required due to the proximity of the site to the Severn Estuary SAC/SPA/Ramsar site. Taking account of these measures, will there be an effect on the developable area of the site that could impact on site densities or overall quantum of development?



11. Has full consideration been given to the impact of the proposal on other factors including the loss of agricultural land and local landscape and is this clearly set out in the evidence base supporting the Plan?
12. Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities justified and effective?
13. How has the amount of employment land been determined and is this sufficient to ensure the site limits the need to travel and is self-sustaining? Are there job growth estimates and are these realistic?
14. How will phasing be used to ensure that employment land and local services and facilities, such as schools, are developed and completed in parallel with housing land completions?
15. Is the site boundary as shown on the policies map accurate?
16. General site layout / masterplanning questions:
  - a. Will the site be delivered in accordance with active design policies?
  - b. How will landscaping and layout address any visual impacts from the site's development?
  - c. A comprehensive green infrastructure network is referred to in the text accompanying the policy. How will the policy ensure that this is designed and delivered as part of any future development proposal? How will this infrastructure be funded?
  - d. Design codes are referred to in order to ensure development is zero carbon and responds to the local context, specifically landscape and heritage elements. How and when will these design codes be brought forward? What will their status be?
17. Is the policy approach to the application of local standards for sports provision justified and effective? Should the policy define the required local provision depending on the size of development?
18. Will the HSE consultation on minimum distance for ammonium nitrate storage at Sharpness Docks impact upon the allocation?
19. The text accompanying the policy refers to community engagement and stewardship as being key to delivering a new community in line with garden city principles. How will this be achieved?
20. Are there any barriers to the site coming forward as anticipated by the housing trajectory? Are delivery assumptions realistic?

Strategic Site Allocation Policy PS37 Wisloe new settlement (within the Berkeley Cluster)

The policy proposes the allocation of land at Wisloe for a new mixed use garden community, including approximately 1,500 new dwellings and 5ha of employment land. The policy requires a range of strategies and plans to be developed that will require approval by the Council. The policy lists 24 elements to be addressed.

21. Does the proposed allocation meet the vision, spatial strategy and strategic objectives set out in the Plan? Does the policy ensure that these objectives will be met?
22. Does the evidence adequately demonstrate that the proposal will accord with the sustainable ethos of garden communities? Is the site of sufficient scale for the delivery of the garden city principles to be feasible? Has this been robustly demonstrated and is the development, as envisaged in the Plan, likely to be achieved during the plan period?
23. Will the proposed new settlement be suitably connected to sustainable transport infrastructure networks to ensure that future residents are able to access an essential range of services, facilities and employment opportunities?
24. In relation to infrastructure:
  - a. Will infrastructure to support the allocations be delivered at the right time and in the right place?
  - b. Are the proposed rail link to the north and the express coach service to the south viable and deliverable? Have funding sources been identified? Will they be delivered on time to support the new settlement? Have discussions taken place with the relevant infrastructure providers and do they support the projects?
  - c. Has the impact of the new settlement on the surrounding road network, including nearby motorway junctions, been adequately assessed? Can any impacts be mitigated and if so, how? Is the policy sufficiently positively worded in this regard, for example with reference to M5 junction 14.
  - d. Will the location of the high pressure gas pipeline that runs through the site constrain the proposed development in anyway? What effect, if any, will the presence of the gas pipeline have on the viability of developing the site?
  - e. Has the effect of the proposed new settlement on the Sharpness Waste Water Treatment Works been adequately assessed? If capacity improvements are necessary can they be delivered within existing environmental constraints and how will they be funded?
25. Is the site boundary as shown on the proposals map accurate and is it justified?

26. Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities justified and effective?
27. Will any impacts on the nearby Severn Estuary SPA/SAC Ramsar Site and SSI be adequately mitigated?
28. In relation to general site layout / masterplanning:
  - a. Will the site be delivered in accordance with active design policies?
  - b. If key landscape corridors are to be retained and kept free from development, will there be sufficient scope within the site to deliver 1500 dwellings at an appropriate density?
  - c. How will landscaping and layout address any visual impacts from the site's development?
  - d. Has sufficient assessment been undertaken of any heritage and / or archaeological factors that may affect the site? For example, comments from Historic England refer to the site containing archaeology from medieval, potentially Roman and prehistoric eras. Does the policy adequately reflect any recommendations from relevant evidence base studies and assessments? Should reference be included in the policy to the need for development to take account of any potentially nationally significant features and the need to conserve them?
29. The site lies within a Minerals Safeguarding Area. What steps, if any, will need to be taken prior to any development to ensure that this issue is mitigated? If extraction is required prior to any development taking place will this affect the viability or timescales for developing the site?
30. Is the policy approach to the application of local standards for sports provision justified and effective? Should the policy define the required local provision depending on the size of development?
31. Does the policy sufficiently ensure that the risk to existing flood risk management assets (due to climate change, rising sea levels and natural deterioration) will be addressed?
32. Has the potential of canal towpath degradation due to increased usage by future occupants of the development been considered? How would this issue be mitigated and addressed if necessary?
33. Reference has been made to footpaths across the site that cross the railway. What is Network Rail's view on this issue? Are there any safety implications that the proposed development would need to take account of? Does the policy need to refer to this?
34. Are there any barriers to the site coming forward as anticipated by the housing trajectory? Are delivery assumptions realistic?

## **Matter 6 Site allocations**

### ***Issue 6 - Are the proposed housing, employment and mixed use site allocations justified, effective and consistent with national policy?***

Our questions on the Council's methodology for site assessment and selection are set out under Matter 2.

The results of the site selection process are set out in various SALA reports and updates produced from 2017 to 2020 (EB19-EB26).

### **Matter 6a Site allocations - General questions**

1. What is the purpose and status of the guiding principles for growth for each of the eight defined areas in Chapter 3 of the Plan?
2. Within the Plan, what is the status of the maps and diagrams for each defined area and site allocation? Are the maps in the Plan accurately duplicating the policies map?
3. Core Policy CP5 sets out environmental development principles for strategic sites.
  - a. How does the policy relate to the strategic site allocation policies, which specify the location of the site, the density of development and set out detailed requirements including the production of a masterplan? What are the reasons for duplicating these elements?
  - b. How does the policy relate to other Plan policies e.g. Core Policies DCP1 and CP14 and Delivery Policies ES1, ES2 and ES3? What are the reasons for any duplication and is this justified?
  - c. How will the requirements A-H in the policy be measured and how will a decision-maker know if the required statement accords with the requirements? What are the benchmarks for assessment?
  - d. Is it clear that the policy applies to all strategic sites set out in the Plan? Are all the requirements relevant to residential and employment strategic sites and are they justified and viable?
  - e. Is the policy and supporting text clear on what a Construction Environmental Management Plan would contain and how will a decision-maker determine when this would need to be produced? Is this approach justified?
  - f. Overall, is the policy consistent with the Framework and is it clear how it relates to national planning guidance including the National Design Guide and National Model Design Code?
4. Site allocations that include housing development specify dwelling capacity figures.

- a. Is it clear how these have been determined for each site allocation? Are they based on the suggested yields from the SALA, or have they been updated to take account of more recent developer evidence or detailed assessments?
  - b. Is the scale of housing for each site allocation justified having regard to any constraints and the provision of necessary additional infrastructure?
  - c. Do the site allocations achieve appropriate densities and make effective use of land, in accordance with the Framework?
  - d. What are the reasons for using different terms for setting out the number of dwellings within each policy, such as 'comprising', 'comprising up to' and 'comprising approximately'? Is there a particular explanation as to why some sites are restricted by an 'up to' number and is this approach consistent with national policy?
  - e. Overall, is the development density and capacity for each individual site justified?
5. Many of the site allocations propose a mix of development but only the number of dwellings is specified. Where other uses such as employment are also sought, why is the size of that other use (i.e. floorspace or land area) not also specified? How will a decision-maker determine if a future development proposal meets the policy and identified needs, if the requirements are not clearly defined?
6. As regards the assessment of development impacting on the landscape and scenic beauty of the AONB, we note the Council's document on Development in the Cotswolds AONB dated May 2021 (EB39). This seeks to assist in justifying the two site allocations for housing development in the AONB (Policy PS05 and Policy PS41). Whilst our questions on these specific sites are set out below, we have the following general queries about the assessment of development impacts on the AONB:
- a. Are the conclusions set out in EB39 justified and consistent with national policy?
  - b. Have all relevant impacts on the AONB from proposed development in the Plan, including sites not within the AONB, been suitably assessed?
  - c. How does the Plan's approach relate to the AONB Management Plan?
  - d. Are the site allocations impacting on the AONB justified and is this clearly set out in the Plan?
7. Which sites are located on the best and most versatile agricultural land and is the loss justified?

8. Does the Plan clearly identify which site allocations are within the SAC, SPA and Ramsar core catchment zones and have suitable assessments been carried out to identify any impacts and appropriate mitigation measures where necessary?
9. Some of the site allocation policies require the provision of 'accessible natural green space' and 'outdoor playing space' and either on-site sports facilities or contributions to off-site facilities, all to be 'in accordance with local standards'.
  - a. What are these local standards, are they based on up-to-date assessments of need, and do they form part of the Plan?
  - b. Is the approach to use 'local standards' in this context, consistent with paragraph 98 of the Framework?
10. What amendments are necessary to reflect the latest Use Classes Order?
11. The Local Site Allocation Policies include an open list of 'particular issues to address' but these are mostly generic in nature. Limited site specific details are provided of what is required from development. Paragraph 16 of the Framework identifies that policies should be 'clearly written and unambiguous, so it is evident how a decision-maker should react to proposals' and should 'serve a clear purpose, avoiding unnecessary duplication of policies'.
  - a. Whilst we set out our specific questions for each site allocation below, we would like to understand why the policies are written so generally, whether the duplication of any policy wording is justified, and how this approach accords with the above national policy?
  - b. Is there sufficient detail in the supporting text to clarify what is required or should this be included in the policy?
12. Can the Council confirm which sites in the Plan have been allocated in a previous plan and explain why these sites have not been successfully delivered? Do the same reasons exist now, and if so, why does the Council consider the sites will be delivered during this plan period?
13. The site allocation policies refer to the production of masterplans and/or development briefs but no further details are set out.
  - a. Does the Plan clearly define what masterplans and development briefs are required to be informed by and what they need to include? Is this set out in policy?
  - b. Is it appropriate for every site allocation to require a masterplan and/or development brief, particularly the smaller sites? Is this justified and proportionate to the scale of development?
  - c. Is the process by which the masterplans and development briefs would be approved by the Council, clearly defined in the Plan? How long would this process take? Are they to be approved before decisions on planning

applications are made? If so, what impact, if any, would this have on site delivery timescales?

- d. Has the proposed delivery of each site taken appropriate account of the timescales for producing and approving masterplans and development briefs, particularly for those sites to be delivered during the first five years from adoption, and the larger or more complex sites?
14. Has an appropriate lead-in time and delivery rate been used when determining the delivery timeframe for each site (whether residential, employment or mixed use) and is this realistic?
15. Overall, is each site allocation justified, viable and deliverable or developable (in accordance with the Framework definitions)?
16. Our questions about housing supply and the trajectory as a whole are under a later matter. However, to assist us in understanding the delivery timescales for each housing site allocation, we would like the Council to provide the trajectory in a single table/spreadsheet, so that we can clearly see how many dwellings each allocated site is expected to deliver in each year of the plan period.

The table/spreadsheet should include a comments column at the end summarising in bullet form the evidence to justify the delivery information it contains. This should also provide an update on the planning status of each site (for example are there pre-application discussions, is there a PPA in place, does the site have outline or full planning permission etc), and it should also summarise any existing uses or known constraints.

Moreover, if it is a previously allocated site that has not been delivered, we wish the Council to set out the reasons for this and to explain why they consider it will be built during this plan period. For completeness, the table/spreadsheet should also include completions (as a total) since the start of the plan period, the timescales for the delivery of commitments that are uncompleted/under construction, and windfall allowances for each relevant year.

**NOTE: In addition to the above general site allocation questions, where we have additional specific questions for each site, these are set out below.**

**Our questions on the identification of safeguarded land are also included under relevant sections.**

## **Matter 6b Stroud Valley site allocations**

### Local Sites Allocation Policy PS01 Brimscombe Mill

17. The site is allocated for 40 dwellings, employment uses and associated community and open space uses and enabling infrastructure.
- a. What type and scale of employment use is proposed?
  - b. What type and level of community and open space uses and enabling infrastructure would be required or are these covered by other policies?
  - c. Are the requirements to restore the mill pond and create a new or improved access from Brimscombe Hill/A419 justified and viable?
  - d. Which heritage assets need to be conserved and enhanced and is the wording in the policy consistent with national policy?
  - e. The policy states that 'local biodiversity' issues need to be addressed for this site. A list of ecological issues has been provided by the Gloucestershire Wildlife Trust, who also advise that the allocation contains part of the River Frome Local Wildlife Site. Why have these specific issues not been included in the policy or supporting text and should they be, for effectiveness?
  - f. As design and flooding are covered by other policies is it necessary for these issues to be duplicated in this policy? Are there any specific site reasons for this?
  - g. The supporting text to the policy at paragraph 3.1.6 of the Plan sets out specific restrictions for the site's development relating to the adjoining Cotswold Canal and a flood risk assessment, but these are not set out in the policy. What are the reasons for this and are the restrictions justified? What impact does this have (if any) on the viability and deliverability of this site?
  - h. We understand this is a previously allocated site. Why has it not been successfully developed and do those same reasons exist now?

### Local Sites Allocation Policy PS02 Brimscombe Port

18. The site is allocated for 150 dwellings, canal related tourism development and employment uses and associated community and open space uses and enabling infrastructure.
- a. Does the supporting text appropriately identify the scale and type of canal related tourism development envisaged for the site? Does this need to be set out in the policy?
  - b. What type and scale of employment use is proposed?



- c. What type and level of community and open space uses and enabling infrastructure would be required or are these covered by other policies?
- d. Which heritage assets need to be 'conserved and enhanced' and is the wording in the policy consistent with national policy?
- e. The policy states that development will include a reinstated canal and port basin and a new access from the A419. Are these requirements justified, viable and deliverable?
- f. The policy states that 'local biodiversity' issues need to be addressed for this site. The allocation also contains part of the River Frome Local Wildlife Site. Why have specific biodiversity issues not been included in the policy or supporting text and should they be, for effectiveness?
- g. As design and flooding are covered by other policies is it necessary for these issues to be duplicated in this policy? Are there any specific site reasons for this?
- h. Has an appropriate lead-in time and delivery rate been used when determining the delivery timeframe for the site in the housing trajectory and is this realistic?

Local Sites Allocation Policy PS05 East of Tobacconist Road

- 19. The site is allocated for up to 80 dwellings and associated community and open space uses and strategic landscaping.
  - a. As regards the site's location within the AONB our queries are as follows:
    - i. Has its allocation within the AONB been robustly justified?
    - ii. Is this suitably recognised within the policy including the policy requirements?
    - iii. How will a decision-maker determine that 'landscape impacts within the Cotswolds AONB' will be minimised when determining future applications for the site?
    - iv. Is the Council's conclusion that the site does not constitute major development, in the context of paragraph 177 of the Framework, justified?
  - b. Evidence appears to identify that the site is also located within the Rodborough Common SAC and Cotswold Beechwoods SAC core catchment zones and the Severn Estuary SAC, SPA and Ramsar core catchment zone, but this is not clearly set out in the policy or supporting text. Representations have also been made regarding impacts of the site's development on Minchinhampton Common SSSI designation.

- i. Can the Council please confirm which designations and catchment zones are relevant to this site allocation and clarify how these have influenced the policy approach in the Plan and any policy requirements?
    - ii. Is the approach justified, effective and consistent with national policy and if not, what modifications would be necessary to make the Plan sound in this regard?
  - c. The policy seeks to incorporate the existing Public Right of Way within the landscaped open space. How much open space is sought and what other types and levels of community and open space uses and strategic landscaping would be required, or are these covered by other Plan policies? Are these justified?
  - d. The evidence in EB39 Appendix A includes statements that, in regard to this site, there are 'Very significant heritage constraints' and that this is 'a highly sensitive site which directly adjoins The Bulwarks designated Scheduled Ancient Monument (SAM)'. The policy only states that heritage assets need to be 'conserved and enhanced' and provides limited further detail.
    - i. What assessments have been carried out of the impact of the proposed development of the site on the significance of relevant heritage assets? How has this informed the decision to allocate the site and what are the development requirements?
    - ii. Is the approach in the Plan, in this respect, justified and is the wording in the policy consistent with national policy and legislation on the historic environment?
  - e. What design and other biodiversity issues need to be addressed or are these covered by other policies?
  - f. Is the inclusion of a sustainable drainage solution justified and is it clear this is a requirement?
  - g. Is the inclusion that affordable housing will be for those with a local connection justified? How will this be determined?
  - h. Some of the representations raise concerns about other issues affecting the site including site access, traffic, loss of grazing land and accessibility to local services and public transport. Have these and any other relevant factors been suitably assessed as part of the process to allocate this site?
  - i. A number of additions to the policy have been suggested in some representations. Are any of these necessary for soundness and if so why?
20. The 'Safeguarded Land PS05a East of Tobacconist Road' site lies within the AONB and is identified in the Plan as being safeguarded 'with potential to meet the future housing needs of Minchinhampton, if required'. However, we are confused as to what the site's status in the Plan is, as it is not a designation or

allocation set out in policy. It is not required to meet any identified needs for the Plan period and it is uncertain as to whether it would be required to meet future needs beyond 2040. Indeed, the Plan specifically states that the principle of development and its allocation will be considered at the next Local Plan Review, 'subject to evidence of local housing need and the site performing best against reasonable alternatives'.

- a. Why is it necessary to identify the site within this Plan, when it may or may not be required in the future and will be considered at the next Local Plan Review? As the site is not allocated within a policy, what is its status in the Plan?
- b. As a site located within the AONB, has the impact of its development on the landscape and scenic beauty of the AONB been robustly assessed?
- c. What about any impacts on other heritage and biodiversity designations and other relevant planning factors?
- d. What is the relationship of this site with the adjacent PS05 site allocation?
- e. Overall, how is the approach to identifying this land in the Plan for 'safeguarding' justified, effective and consistent with national policy?

#### Local Sites Allocation Policy PS06 The New Lawn, Nailsworth

21. The site is allocated for approximately 90 dwellings and associated community and open space uses and enabling infrastructure.
  - a. The site's delivery is subject to the relocation of Forest Green football club and the retention or relocation of associated community uses. What progress has been made on this?
  - b. Particular issues to address, as set out in the policy, include 'enhancing local biodiversity and enhancing the landscape on this AONB edge of Nailsworth'. What are these issues, what will be required from development on this site and should they be set out in the policy?
  - c. The supporting text states that the 'historic hedgerow along the western boundary and the semi natural grassland parcels should be retained with no adverse impacts on adjacent wildlife sites'. Should these specific requirements be set out in policy and are they justified?
  - d. Some of the representations raise concerns about other issues relating to the development of the site, including congestion and road access. Have such factors been suitably assessed as part of the process to allocate this site?

#### Local Sites Allocation Policy PS10 Cheapside, Stroud

22. The site is allocated for approximately 75 dwellings and town centre uses.

- a. Does the policy clearly set out what type and level of town centre uses would be required and are they justified?
- b. The development proposes to include an improved bus/rail interchange, improved access to the station and the retention and improvement of community uses around the Brunel Goods Shed. Are these requirements justified and are they viable?
- c. The policy requires the Town Centre Conservation Area to be addressed. What is actually required from the development in this context and is the wording in the policy consistent with national policy? Does this requirement duplicate other Plan policies?
- d. The policy also seeks 'the provision of a sufficient level and quality of public parking'.
  - i. How is this to be determined and is it justified by robust evidence? Where is the evidence to confirm the necessity for public car parking in this location (for instance, is there a town centre car parking strategy)?
  - ii. If it is unclear how much public parking is required within the site, how can the Council be sure that the other development proposed, is viable and achievable?
- e. Some of the representations raise concerns about other issues relating to the development of the site, including the adjacent Stroudwater Canal Local Wildlife Site and access links. Have such factors been suitably assessed as part of the process to allocate this site?

Local Sites Allocation Policy PS11 Merrywalks Arches, Stroud

23. The site is allocated for 25 dwellings and town centre uses.
  - a. Does the policy clearly set out what type and level of town centre uses would be required and are they justified?
  - b. Development is to be centred around the re-use of the local heritage asset. The site is located within the Industrial Heritage Conservation Area and the policy requires conserving and enhancing heritage assets. What is actually required from the development in heritage terms and is the wording in the policy consistent with national policy? Do these requirements duplicate other Plan policies?
  - c. The policy states that the 'feasibility of opening a pedestrian route between the site and Rowcroft should be considered', but it is unclear what this wording actually means as the policy does not specifically require a feasibility study to be produced. Can the Council clarify what it is they are expecting developers to deliver and explain why this is justified?
  - d. The policy also requires other issues to be addressed including flooding and engineering issues with the sloping nature of the site. What is actually

required from the development in these terms, are the requirements justified and effective, or do they duplicate other Plan policies?

Local Sites Allocation Policy PS12 Police Station / Magistrate's Court, Stroud

24. The Plan states that the site forms part of an 'important gateway into the town' and on which are located the 'current Police Station and former Magistrate's Court'. It is proposed to be redeveloped for up to 45 dwellings and town centre uses.
- a. Does the policy clearly set out what type and level of town centre uses would be required and are they justified?
  - b. Is the police station still in use? Has the local constabulary confirmed whether a replacement police station is required or not? If this is required can the other policy requirements be accommodated on site?
  - c. The policy also requires particular issues to be addressed including site levels and proximity to the Stroud Town Centre Conservation Area. What is actually required from development in these terms, does this need to be made more explicit within the policy or are requirements set out in other Plan policies?
  - d. Why is it necessary, within the supporting text, to make reference to the potential for a wider redevelopment site to include the neighbouring Church Street car park site? Is this a separate site allocation within the Plan?

Local Sites Allocation Policy STR065 Land at Beeches Green, Stroud

25. This 'current NHS health centre site' is allocated for approximately 20 dwellings, healthcare and extra care accommodation.
- a. Is the health centre still in use? Has the local NHS Trust confirmed that replacement healthcare facilities are required? If this is required can the other policy requirements be accommodated on site?
  - b. What size of extra care accommodation is required, is it feasible and is it justified by robust evidence?
  - c. The policy also requires particular issues to be addressed including enhancing the setting of adjacent listed buildings and improving sustainable access through the site. Are the requirements relating to the historic environment justified and consistent with national policy? Is sustainable access through the site feasible? Do these requirements duplicate other Plan policies?
  - d. Why is it necessary, within the supporting text, to make reference to opportunities for wider regeneration within the locality? Is this set out in other policies in the Plan?

## **Matter 6c Stonehouse cluster site allocations**

### Local Sites Allocation Policy PS42 Land off Dozule Close, Leonard Stanley

26. The site is allocated for up to 15 dwellings and associated open space uses.
- a. The policy seeks the retention of the majority of the southern part of the site in open space use and the conservation of existing hedgerows and trees. Are these requirements justified and sufficiently clear to a developer or decision-maker?
  - b. The supporting text states that development should be focused on the northern part of the site with access from Dozule Close. Is this justified and should this be clearly set out within the policy?
  - c. The supporting text also references the provision of new footpath and cycle links. Is this justified and if so, should it be clearly set out within the policy?

### Local Sites Allocation Policy PS16 South of Leonard School Stanley Primary School

27. The site is allocated for up to 25 dwellings and associated open space uses.
- a. The policy seeks the conservation of existing hedgerows and trees adjacent to Bath Road. Is this justified and achievable?
  - b. The supporting text references the provision of new footpath and cycle links. Is this justified and if so, should it be clearly set out within the policy?

### Local Sites Allocation Policy PS17 Magpies site, Oldends Lane, Stanley

28. The site is allocated for up to 10 dwellings, a new community building with car parking and landscaping.
- a. The policy requires the safeguarding of land to allow for a future pedestrian bridge across the railway line at Oldends Lane.
    - i. Is the bridge required and if so what progress has been made on securing it?
    - ii. Is suitable land available to the west of the railway line for the bridge? If not, how will the bridge be delivered?
    - iii. What is the timescale for the delivery of the bridge and is funding in place for its construction?
    - iv. Overall is the bridge feasible and is the safeguarding of land justified?
  - b. Is the policy clear on what landscaping would be required or is this covered by other Plan policies?
  - c. Has an appropriate delivery timeframe for the development of the site been identified in the housing trajectory and is this realistic, particularly taking into account the requirement for a new community building? Is the housing provision tied in with the delivery of the community building?

## Strategic Site Allocation Policy PS19a Stonehouse North West

29. The site is an extension to Stonehouse at Great Oldbury. It is allocated as a mixed use development including approximately 700 dwellings, 8 plots for travelling showpeople uses, approximately 5 ha for defined employment uses and the provision of or contributions to community facilities. The policy seeks a development brief incorporating an indicative masterplan, that will address 21 listed requirements.
- a. Are all the 21 criteria, which list a varied range of requirements, justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective?
  - b. Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?
  - c. Do any policy requirements duplicate other Plan policies and if so, why?
  - d. As regards the provision of 8 plots for travelling showpeople uses:
    - i. Have discussions with the travelling showpeople community taken place to assess both the suitability of the overall location and the site?
    - ii. Are some areas within the site considered more suitable for this use than others? For instance, can easy and separate access to the local highway network be achieved?
    - iii. Each plot will typically need to include space for caravan accommodation and for the storage and maintenance of rides, and other vehicles and equipment. Has the extent of the land area required for the proposed 8 plots been determined and can this be easily accommodated within the proposed development?
  - e. Paragraph 3.2.13 of the Plan refers to the need for substantial structural landscaping to protect the landscape setting of Standish, open countryside and views from the AONB. Is this effectively set out in the policy?
  - f. Reference has been made within the representations to adverse impacts on the River Frome Local Wildlife Site and the Severn Estuary SPA, SAC and RAMSAR sites. Has the impact of the site allocation been suitably assessed and any necessary mitigation determined in these regards?

## Strategic Site Allocation Policy PS20 Stonehouse – Eco Park M5 Junction 13

30. This site is allocated for a strategic mixed use development, to include employment, a sports stadium, sports pitches, a 70 bed care village, a hotel and canal and open space uses. The policy seeks a development brief incorporating an indicative masterplan, that will address 20 listed requirements.

- a. The County Council representation highlights that part of the site allocation falls within designated Mineral Safeguarding Areas (MSAs) and that no reference is made to this within the policy or supporting text. This issue is acknowledged in the relevant Statement of Common Ground. What extent of the site is within the MSAs and what implications does this have for the allocation and the policy overall?
- b. The supporting text states that the site is 42 ha in size. Approximately 10 ha of land for business uses are defined under criterion 2. How has this been determined and is it justified? Do the other proposed uses add up to the remaining 32 ha and are they justified?
- c. What is meant by a 'care village' and is this robustly justified in this location? Is the size of the facility (70 bed) based on need and is it viable?
- d. As regards the Industrial Heritage Conservation Area (IHCA):
  - i. Paragraph 3.2.21 implies that part of the development proposals would be located within the IHCA. Is this the case?
  - ii. Is the canal cut and towpath etc located within the site?
  - iii. Criterion 9 implies that there will be harm to the IHCA from the development of the site, as the wording seeks less than substantial harm. Is this approach consistent with national policy and legislation, particularly as regards the desirability of preserving or enhancing the character or appearance of a conservation area? Is the approach justified?
- e. Are there particular reasons as to why certain facilities, such as the sports stadium and care village, are to be located in specific areas of the site? Does this overly restrict the development brief process?
- f. What progress has been made on the re-opening of Stonehouse Bristol Road rail station, what are the timescales for its delivery and is it feasible? Is criterion 15 justified?
- g. Overall, are all the policy requirements justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective?
- h. Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?
- i. Do any policy requirements duplicate other Plan policies and if so, why is this necessary?



## **Matter 6d Cam and Dursley site allocations**

### Strategic Site Allocation Policy PS24 Cam North West

31. The site is identified as a sustainable urban extension to Cam and is allocated for strategic housing development, to include approximately 900 dwellings and community uses. The policy seeks a development brief incorporating an indicative masterplan, that will address 18 listed requirements.
- a. Paragraph 3.3.6 of the Plan states that the development will include 'residential and community uses that meet the day to day needs of its residents'. Whilst the policy seeks educational and healthcare provision or contributions, there appears to be no provision for employment and retail uses which are generally necessary to meet day to day needs. Is this because such facilities are within close proximity and if so, what are the walking distances to such facilities from within the site?
  - b. Are all the 18 criteria, which list a varied range of requirements, justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective?
  - c. Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?
  - d. Do any policy requirements duplicate other Plan policies and if so, why is this necessary?
  - e. Paragraph 3.3.9 of the Plan refers to the need for substantial structural landscaping to protect Cam's landscape setting and views from the AONB escarpment. Is this effectively set out in the policy and does the approach accord with paragraph 176 of the Framework as regards the setting of the AONB?
  - f. Reference has been made within the representations to potential adverse impacts on the Severn Estuary SPA, SAC and RAMSAR site. This potential is recognised in paragraph 3.3.10 of the Plan. Has the impact of the site allocation been suitably assessed and any necessary mitigation determined in these regards?

### Strategic Site Allocation Policy PS25 Cam North East Extension

32. The site is identified as a southerly extension to the existing North East of Cam (Millfields) strategic development site. It is allocated for approximately 180 dwellings and associated community and open space uses. The policy seeks a masterplan, and states that development will include 8 listed requirements.
- a. Are the 8 criteria justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective?

- b. Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?
- c. Some of the representations raise concerns about other issues relating to the development of the site, including lack of local facilities and services, flooding, impact on landscape/AONB and loss of wildlife. Have such factors been suitably assessed as part of the process to allocate this site?

Local Sites Allocation Policy PS27 1-25 Long Street, Dursley

33. The site is allocated for partial redevelopment and reuse for town centre uses.
- a. The supporting text refers to the need for land assembly to maximise the redevelopment opportunities of the site whilst still providing for existing uses.
    - i. What progress has been made on this land assembly and is the site allocation deliverable?
    - ii. What existing uses are to remain?
    - iii. What amount of car parking (and any other operational requirements) will need to be retained and would this impact on any redevelopment opportunities?
  - b. Exactly what town centre uses are envisaged for the site and are these justified?
  - c. Some representations have referenced the Dursley Neighbourhood Development Plan. What are the implications of this to the site allocation and the policy requirements?
  - d. The policy states that heritage assets need to be ‘conserved and enhanced’ through high quality design, but does not specify which heritage assets this relates to. The supporting text refers to the Dursley Conservation Area, and ‘taking account of the site’s archaeological potential and its contribution to the setting and significance of nearby listed buildings’.
    - i. What assessments, if any, have been carried out of the impact of the proposed partial redevelopment and reuse of the site on the significance of these heritage assets? How has this informed the decision to allocate the site and the development requirements?
    - ii. Is the approach in the Plan, in this respect, justified and is the wording in the policy consistent with national policy and legislation on the historic environment?
  - e. The policy also requires the ‘safeguarding and enhancing of local biodiversity’ but does not provide specific detail on what this relates to. The

supporting text refers to the need to conserve and enhance tree planting within the site. Is this policy requirement suitably clear and is it justified? Or is this issue covered by other Plan policies?

Local Sites Allocation Policy PS28 Land off Prospect Place, Dursley

34. The site is allocated for up to 10 dwellings, open space and town centre uses.
- a. The supporting text refers to the need for land assembly to maximise the redevelopment opportunities of the site whilst still providing for existing uses.
    - i. What progress has been made on this land assembly and is the site allocation deliverable?
    - ii. What existing uses are to remain?
    - iii. What operational requirements will need to be retained and provided for and would this impact on any redevelopment opportunities?
  - b. Can the site viably accommodate existing uses and their operational requirements, residential development and open spaces? What type and amount of open space is envisaged? Are these uses justified?
  - c. The policy states that heritage assets need to be ‘conserved and enhanced’ through high quality design, but does not specify which heritage assets this relates to. The supporting text refers to the Dursley Conservation Area, and ‘taking account of the site’s archaeological potential and its contribution to the setting and significance of nearby listed buildings’.
    - i. What assessments, if any, have been carried out of the impact of the proposed partial redevelopment and reuse of the site on the significance of these heritage assets? How has this informed the decision to allocate the site and the development requirements?
    - ii. Is the approach in the Plan, in this respect, justified and is the wording in the policy consistent with national policy and legislation on the historic environment?
  - d. The policy also requires the ‘safeguarding and enhancing of local biodiversity’ but does not provide specific detail on what this relates to. Is the policy requirement suitably clear on what local biodiversity this relates to and is it justified? Or is this issue covered by other Plan policies?
  - e. The supporting text refers to long views and the need for sensitive design. Is this in relation to heritage assets or the surrounding area more generally? Is this justified and if so, does it need to be specifically set out in the policy or is it covered by other Plan policies?

## **Matter 6e Gloucester's rural fringe site allocations**

### Local Sites Allocation Policy HAR017 Land at Sellars Road, Hardwicke

35. The site is allocated for up to 10 dwellings and open space uses.
- a. Does the policy clearly set out what type and level of open space uses would be required or is this covered by other policies? Is this requirement justified?
  - b. The policy requires particular issues to be addressed, including integration with surrounding land uses, undertaking a precautionary archaeological evaluation and surface water management. Are these requirements clear and are they justified? Or are such issues covered by other Plan policies?
  - c. Reference is made in the supporting text to conserving the setting of the adjacent canal and to retain trees and hedgerows. In relation to the canal towpath it adds that there are opportunities to improve pedestrian and cycle linkages. Are these justified and if so, should they be made explicit within the policy as requirements, or are they covered by other Plan policies?

### Strategic Site Allocation Policy PS30 Hunts Grove Extension

36. The site is allocated as an extension to the existing Hunts Grove development. It is proposed to 'deliver an additional 750 dwellings, including 225 affordable dwellings (unless viability testing indicates otherwise)'. The policy seeks a comprehensive masterplan which demonstrates how the extension will be integrated into the Hunts Grove new community and lists 13 requirements.
- a. Are all the 13 listed requirements justified by robust evidence, are they sufficiently clear in their detail and do they all relate to the site allocation? Do any requirements duplicate other Plan policies and if so, why?
  - b. The map for the site on page 146 of the Plan provides 'indicative information'. The local centre, primary school and safeguarded area for potential future rail halt, are all shown as being outside the site allocation, and are instead within the wider Hunts Grove development. However, these are listed as requirements to be addressed in the masterplan for the Hunts Grove extension. Can the Council provide clarification on this?
  - c. The provision of 225 affordable houses is subject to viability testing. Is this approach justified, does it correspond with Core Policy CP9 on affordable housing, and is it consistent with national policy? Has the affordable housing provision for this site been viability tested?
  - d. Some of the representations include suggested modifications to the policy wording, particularly in relation to criteria 10 and 12. Another includes a suggested new criterion on appropriate mitigation measures or replacement green infrastructure to safeguard the AONB from development pressure. Are any of these suggested modifications necessary for soundness?

- e. Some representors raise other concerns relating to the development of the site, including the impact of additional traffic, the loss of green space and the effect on local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?

#### Employment Allocation Policy PS32 Quedgeley East Extension

37. The site is 5 hectares in size and is allocated as an extension to the Quedgeley East Business Park, for office, B2 and B8 employment uses. The policy also requires a strategic landscape buffer along the south-eastern edge of the development.
- a. Is an extension to the existing employment site in this location, and with the specified uses, justified by robust evidence?
  - b. As regards the strategic landscape buffer, is the Plan sufficiently clear about what would be expected to be delivered within the site or is this covered by other Plan policies?
  - c. The policy requires sustainable transport measures and necessary highway improvements. What specifically would the development need to provide, are they justified and would they be viable?
  - d. Some of the representations raise concerns about other issues relating to the development of the site, including the protection of ancient trees and the impact on the environment and local character. Have such factors been suitably assessed as part of the process to allocate this site?

#### Employment Allocation Policy PS43 Javelin Park

38. The site is 27 hectares in size and is allocated as an extension to the key employment site EK14 Javelin Park for office, B2 and B8 employment uses. The policy also requires a strategic landscape buffer along the western, southern and eastern boundaries of the development.
- a. Is an extension to the existing employment site in this location, and with the specified uses, justified by robust evidence?
  - b. As regards the strategic landscape buffer, is the Plan sufficiently clear about what would be expected to be delivered within the site or is this covered by other Plan policies?
  - c. The policy requires sustainable transport measures and necessary highway improvements. What specifically would the development need to provide, are the requirements justified and would they be viable and deliverable?
  - d. The supporting text refers to development minimising 'potential visual impacts upon the heritage assets and their immediate settings at adjacent Haresfield' and the AONB, but these are not set out in the policy.

- i. What is the significance of these heritage assets and has any assessment been carried out to determine what the potential impacts of development would be in this regard?
  - ii. Why is a requirement to conserve the significance of these heritage assets and their settings not identified within the policy? Is this suitably set out in other Plan policies? Is the wording in the supporting text consistent with national policy on the historic environment?
  - iii. Has the impact of development within this site, in relation to the AONB, been robustly considered and is this clearly set out in the Plan?
- e. Some of the representations raise concerns about other issues relating to the development of the site, including the effect of additional traffic and the impact on the environment and local character. Have such factors been suitably assessed as part of the process to allocate this site?

#### Strategic Site Allocation Policy G1 South of Hardwicke

39. The site is identified as an urban extension to Hardwicke and is allocated as a strategic housing development, including residential and community uses. The policy seeks a development brief incorporating an indicative masterplan which 'will address' 20 policy criteria. The site is proposed to include approximately 1,350 dwellings.
- a. Are the 20 criteria justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective? Do some criteria unnecessarily repeat other Plan policies?
  - b. Whilst the policy includes the development of a local centre and educational and healthcare provision or contributions, there appears to be no provision for other employment uses. Is this because such facilities are within close proximity and if so, what are the walking distances to such facilities from within the site?
  - c. Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?
  - d. Some of the representations raise concerns about other issues relating to the development of the site, including environmental impact. Have such factors been suitably assessed as part of the process to allocate this site?

#### Strategic Site Allocation Policy G2 Land at Whaddon

Further to our previous questions under Matter 3 on meeting Gloucester City's unmet housing need and whether the principle of this site allocation as safeguarded land is soundly based, we have the following additional questions on the specific details within the policy.

40. The site is proposed to be 'safeguarded' to meet future housing needs of Gloucester City, if required. The policy seeks a development brief incorporating an indicative masterplan, that will address 22 listed requirements. This includes the provision of at least 3,000 dwellings, 8 serviced plots for travelling showpeople and necessary infrastructure.
- a. If this is proposed as a safeguarded site and a decision on whether it would be allocated for development would be made through a future review of the Plan, why is it necessary at this stage to set out specific requirements for the site?
  - b. Are all the 22 listed requirements justified by up to date robust evidence and are they sufficiently clear and effective in their level of detail? Do any duplicate other Plan policies and if so, why?
  - c. Have all site constraints and development impacts been robustly assessed, particularly as regards highways and opportunities for sustainable modes of transport?
  - d. Are necessary infrastructure requirements and mitigation measures proposed within the policy and would these ensure the development was sustainable, particularly in terms of travel modes?
  - e. Has the boundary been correctly drawn on the maps within the Plan (pages 155 and 160) and on the policies map?
  - f. Some representors raise other concerns relating to the development of the site, including the impact on wildlife, flooding and the character of the area and the recreational pressures on the AONB. Have such factors been suitably assessed as part of the process to allocate/safeguard this site?
  - g. The site does not form part of the housing trajectory. If the site was found to be required to meet unmet housing needs, what would be its delivery timeframe and would this be realistic?

## **Matter 6f The Berkeley cluster site allocations**

### Local Sites Allocation Policy PS33 Northwest of Berkeley

41. The site is allocated for approximately 110 dwellings and associated open space uses and strategic landscaping along the northern and eastern boundaries, to provide an extension to Berkeley.
- a. Does the policy clearly set out what type and level of open space uses and strategic landscaping would be required or is this covered by other policies? Are the requirements justified?
  - b. How will development be required to minimise landscape impacts, safeguard and enhance local biodiversity and provide new and enhanced footpath and cycle links? What are the specific requirements, are they justified and do they need to be made clear in the policy or are such issues covered by other Plan policies?
  - c. The policy states that development should not increase flood risk on or off site. The supporting text refers to flood risk attenuation and enhancements. Do specific flood risk requirements need to be set out in this policy or are such matters covered by other Plan policies?
  - d. Some of the representations raise concerns about other issues relating to the development of the site, including increased traffic impact and the availability of local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?

### Local Sites Allocation Policy BER016/017 Land at Lynch Road, Berkeley

42. The site is allocated for up to 60 dwellings and open space.
- a. What type and level of open space would be required or is this covered by other policies?
  - b. How will development be required to include structural landscaping to integrate the development into the landscape? What are the specific requirements, are they justified and do they need to be made clear in the policy or is this covered by other Plan policies?
  - c. The policy states that development should not increase flood risk on or off site. The supporting text seeks to 'ensure no adverse impacts on the adjacent watercourse and area subject to flooding'. Do specific flood risk requirements need to be set out in this policy or are such matters covered by other Plan policies?
  - d. Some of the representations raise concerns about other issues relating to the development of the site, including increased traffic impact and the availability of local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?



### Strategic Site Allocation Policy PS34 Sharpness Docks

43. The site is allocated for mixed development, including an area of 7 ha for dock uses and dock related industries in Sharpness Docks South and a mix of housing (up to 300 dwellings), tourism, leisure and recreational uses in Sharpness Docks North.
- a. Are the 14 criteria under a) and b) of the policy and the two additional requirements relating to the disused rail line and the protection of the SAC/SPA/Ramsar site, justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective? Do some criteria unnecessarily repeat other Plan policies?
  - b. Has the impact of this development proposal on the Severn Estuary SAC/SPA/Ramsar site been suitably assessed as part of the process to allocate this site? Is it clear what avoidance and mitigation measures may be necessary?
  - c. Where will local residents access every day local services and facilities, such as schools, shops and healthcare? What are the walking distances to such facilities from within the site?
  - d. Have impacts of the development on existing infrastructure (including J14 of the M5) been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?
  - e. Some of the representations raise concerns about other issues relating to the development of the site, including the environmental, heritage and wildlife impacts, access issues, and the presence of minerals and waste infrastructure and ammonium nitrate storage. Have such factors been suitably assessed and taken into account as part of the process to allocate this site?

### Local Sites Allocation Policy PS35 Land at Focus School, Wanswell

44. The site is allocated for up to 70 dwellings and community use and open space, including the retention and enhancement of existing playing pitches and open space. The evidence advises that the education providers of the school on the site are intending to vacate the site.

The policy states that a particular issue to address will include 'considering redevelopment within the context of the adjacent PS36 new settlement to ensure that retained open space meets the specific recreation needs of the wider new community'. The site does not form part of the site allocation for the new settlement and is not adjacent to the new settlement as allocated in the Plan. We note that the map on page 175 of the Plan shows the site adjacent to what could potentially be 'phase 2' of the new settlement but this separate land is not allocated in this Plan.

- a. What does the term 'considering redevelopment' in this context actually mean? What is actually expected from the development and is this clear in the policy?
- b. Can the Council please clarify the site's relationship to the proposed new settlement? Is the development of part of this site for housing justified now?
- c. Are the existing playing pitches and open space required for the existing community? If so, why are they included in a site allocation for development?
- d. Does the evidence robustly demonstrate that the existing playing pitches and open space are required for the new settlement? Can the Council point us to this evidence please?
- e. The site is not adjacent to the site allocation for the new settlement, so are the facilities in the best location? How has this been determined? How will future residents access the facilities? If the facilities are required for the new settlement, why is the land not proposed to be allocated as part of that site?
- f. The supporting text to the policy advises that development should be restricted to the footprint of the school buildings and associated brownfield land, but this is not set out in the policy. Should it be and if so is this approach justified?
- g. The policy title is incorrect as it refers to a different site so can the Council amend this?
- h. What 'community uses' are envisaged within the site, are they justified and do they need to be expressly set out in the policy?
- i. The supporting text also refers to enhancing existing landscaping and planting for local biodiversity. Does this need to be set out in the policy or is this covered by other Plan policies? What would be actually required for the site in this context?
- j. Some of the representations raise other concerns relating to the development of the site, including legal restrictions, the impact of additional traffic and the availability of local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?

## **Matter 6g The Severn Vale site allocations**

### Local Sites Allocation Policy PS44 Northwest of Whitminster Lane

45. The site is allocated for approximately 30 dwellings and open space use to provide an extension to Frampton-on-Severn.
- a. What type and level of open space uses would be required or is this covered by other policies?
  - b. The policy lists three issues to be addressed which include incorporating the Public Right of Way into the development, the proximity of the Gloucester and Sharpness Canal and ensuring a high quality edge to Frampton. What specifically would the development be required to achieve; would the requirements be justified and are they viable? Should these be clearly set out within the policy?
  - c. Some of the representations raise concerns about other issues relating to the development of the site, including drainage and sewage infrastructure, the siting of the access and the availability of local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?

### Local Sites Allocation Policy PS45 Land west of Upton's Garden, Whitminster

46. The site is allocated for approximately 10 dwellings and open space uses and strategic landscaping.
- a. What type and level of open space uses and strategic landscaping would be required or is this covered by other policies? The supporting text states that the western half of the site should be retained as accessible open space, to protect the setting of Parklands House to the south, but reasons for this are not given. Is this a heritage asset and is the retention of open space justified in this context?
  - b. Which heritage assets need to be 'conserved and enhanced' and is the wording in the policy consistent with national policy?
  - c. How will a decision-maker determine whether landscape impacts are minimised and local biodiversity is safeguarded and enhanced? Do specific biodiversity and landscape requirements need to be made clear in the policy or are such issues covered by other Plan policies?
  - d. Should the requirements in the supporting text be set out in the policy and if so are they justified and suitably clear?
  - e. Some of the representations raise concerns about other issues relating to wildlife habitat, waste water infrastructure and public transport. Have such factors been suitably assessed as part of the process to allocate this site?

Local Sites Allocation Policy PS46 Land west of School Lane, Whitminster

47. The site is allocated for up to 40 dwellings and open space uses and strategic landscaping.
- a. Some details on open space and landscaping are provided in the supporting text. Are these policy requirements, are they justified and should they be set out in the policy?
  - b. How will a decision-maker determine whether landscape impacts are minimised? What is strategic landscaping? Do specific landscape requirements need to be made clear in the policy or are such issues covered by other Plan policies?
  - c. Some of the representations raise concerns about other issues relating to the Industrial Heritage Conservation Area, waste water infrastructure and public transport. Have such factors been suitably assessed as part of the process to allocate this site?

## **Matter 6h The Wotton cluster site allocations**

### Local Sites Allocation Policy PS38 South of Wickwar Road, Kingswood

48. The site is allocated for 50 dwellings and open space uses.
- a. What type and level of open space uses would be required or is this covered by other policies?
  - b. The policy states that 'local biodiversity' issues need to be addressed for this site. The policy also refers to 'integrating the development into the landscape setting'. The supporting text states that development will retain and enhance existing trees and hedgerows to support these two aims, but this is not set out in the policy. Is this approach justified? Do specific biodiversity and landscape requirements need to be made clear in the policy or are such issues covered by other Plan policies?
  - c. The supporting text also refers to walking and cycling routes being within the site but these are not set out in the policy. Can the Council clarify the reasons why and explain whether they are justified as requirements?
  - d. The requirement for highway safety improvements to access services within the village is referenced in the policy? What specifically would the development need to provide, and would they be justified and viable?
  - e. Some of the representations raise concerns about other issues relating to the development of the site, including increased traffic impact and the availability of local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?

### Employment Allocation Policy PS47 Land west of Renishaw New Mills

49. The site is 10 hectares in size and is allocated as an extension to the key employment site EK17 Renishaw New Mills for a mix of office, B2 and B8 uses.
- a. Is an extension to the existing employment site in this location justified by robust evidence?
  - b. What type and level of open space uses would be required within the site or is this covered by other Plan policies?
  - c. The policy states that 'local biodiversity' issues need to be addressed for this site. The policy also refers to 'integrating the development into the landscape setting'. The supporting text states that development will retain and enhance existing trees and hedgerows to support these two aims, but this is not set out in the policy. Do specific biodiversity and landscape requirements need to be made clear in the policy or are such issues covered by other Plan policies?

- d. The supporting text also refers to walking and cycling routes being within the site but these are not set out as requirements in the policy. Can the Council clarify the reasons for this and explain whether they are justified as requirements?
- e. The requirement for highway safety improvements to access services within the village is referenced in the policy? What specifically would the development need to provide, and would they be justified and viable?
- f. Some of the representations raise concerns about other issues relating to the development of the site, including increased traffic impact and the availability of local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?

## **Matter 6i The Cotswold cluster site allocations**

### Local Sites Allocation Policy PS41 Washwell Fields, Painswick

50. The site is allocated for up to 20 dwellings and open space uses.
- a. As regards the site's location within the AONB our queries are as follows:
    - i. Has its allocation within the AONB been robustly justified and is this suitably recognised within the policy?
    - ii. How will a decision-maker determine that 'landscape impacts within the Cotswolds AONB' will be minimised when determining future applications for the site?
    - iii. Is the Council's conclusion that the site does not constitute major development, in the context of paragraph 177 of the Framework, justified?
  - b. How much open space is sought within the site and is this justified?
  - c. The evidence in EB39 Appendix A includes statements that, in regard to this site, there are 'no significant heritage constraints'. The site adjoins the garden grounds of the Grade II listed Washwell House and there are two conservations areas (Painswick and Gyde House) within the surrounding area. The policy refers to 'conserving heritage assets and their settings' and the supporting text mentions 'heritage properties along Cheltenham Road'.
    - i. What assessments have been carried out of the impact that the development of the site may have on the significance of all relevant heritage assets? How has this informed the decision to allocate the site?
    - ii. Is the approach in the Plan justified and is the wording in the policy consistent with national policy and legislation on the historic environment?
  - d. What specific ecological, landscape and access issues need to be addressed? Why does the policy refer to 'potential' impacts?
  - e. Is the policy wording that affordable housing will be for those with a local connection justified? How will this be assessed?
  - f. Some of the representations raise concerns about other issues affecting the site including a restrictive covenant, the impact of additional traffic, and inadequate local services. Have these factors been suitably assessed as part of the process to allocate this site?

## Matter 7 Housing Provision

***Issue 7 – Does the Plan set out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy? Are the policies for housing development, including those to meet specific needs, sound?***

### Matter 7a Housing supply

#### Overall supply

Table 2 of the Plan (page 33) summarises the housing land supply for the plan period. This includes commitments, allocations and a small sites allowance (windfall) which together form a total housing supply of 14,935 dwellings. Taking commitments of 4,595 dwellings off the housing requirement of 12,600 dwellings leaves a minimum residual housing requirement of at least 8,005 dwellings.

The Topic Paper EB8 confirms that the Housing Land Supply Assessment Update November 2020 (EB15) provides the latest evidenced schedule of large site progress and anticipated delivery from developers and site promoters for all major development sites.

1. As identified in Table 2 of the Plan, the site commitments are based on April 2020 data, except small sites which are based on April 2019.
  - a. Are more recent updates available listing all housing completions since the start of the plan period and commitments (sites with planning permission)?
  - b. Can the Council explain why sites with resolutions to grant permission are included as 'firm commitments'? Are all these sites subject to the signing of section 106 agreements or are there other reasons for the delay in granting permission? What are the timescales for the decisions to be issued? Are such sites proposed to be within the five year supply from adoption of the Plan and if so, are they justified?
  - c. The table also includes undeliverable commitments of 620 dwellings. What are the reasons for these sites to be undeliverable and is their removal from the supply justified?
2. Does the supply identify sufficient land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, in accordance with paragraph 69 of the Framework?
3. Paragraph 74 of the Framework states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period. No such trajectory appears to be in the Plan. Is there a particular reason for this? Also has consideration been given as to 'whether it is appropriate to set out the anticipated rate of development for specific sites' within the Plan?



4. Is there sufficient flexibility in the housing trajectory to ensure that housing land supply within the Plan area will be maintained and will deliver the housing requirement?
5. Is there credible evidence to support the expected delivery rates set out in the housing trajectory? The annual housing requirement of 630 dpa would be a significant rise in house building rates from recent and historic trends in the borough. Does the evidence support that this is achievable?
6. Does the allowance for windfall sites accord with paragraph 71 of the Framework?

#### Five year housing land supply

Within the Housing Needs and Supply Topic Paper (EB8) at Table 7, the Council suggests they are able to demonstrate a 6.57 year housing land supply. This is for the period 1 April 2020 to 31 March 2025 and is based on a minimum annual housing requirement of 630 dpa.

7. Although paragraph 68 of the Framework seeks that planning policies identify a supply of deliverable sites for 'years one to five of the plan period', the PPG advises that 'strategic policies should identify a 5 year housing land supply from the intended date of adoption of the plan'. No practical purpose is served by assessing five year supply from an earlier date.
  - a. Can the Council produce a five year supply calculation looking forward five years from around the intended date of adoption of the plan? Is it based on robust evidence and is it justified?
  - b. Are any adjustments necessary to take account of any shortfall or over-supply since the Plan's base date?
8. As identified in the Council's Five Year Housing Land Supply document (2020) (EB14), a non-implementation rate of 22% is applied to small sites with planning permission. This appears to be based on recommendations in a 2013 report which reviewed the Council's land supply. Is there more up to date evidence to confirm why such a high rate is justified? Is this approach proposed for this plan period and if so, does it accord with the definition of 'deliverable' within the Framework? Overall, is the approach justified?

## **Matter 7b Meeting specific housing needs**

### Inclusive communities - Core Policy CP7

9. This policy requires developers of major housing development to demonstrate how the proposal 'will contribute to meeting identified long term needs' within relevant communities, and sets out a list of needs to be taken into account.
  - a. National policy seeks plans that meet development needs. In relation to housing needed for different groups in the community, paragraph 62 of the Framework states that this 'should be assessed and reflected in planning policies'.
    - i. Have the long term housing needs for specific groups within the District been robustly assessed and identified in the Plan? If so, what are these and are they justified?
    - ii. Are the development requirements for meeting these specific housing needs clearly defined within policies?
    - iii. If this is the case for this Plan, what is the purpose of Core Policy CP7?
  - b. How does Core Policy CP7 relate to other policies in the Plan, such as Core Policies DCP2 and CP8, and the site allocations? Does it unnecessarily or confusingly duplicate other Plan policies?
  - c. As the policy reads more like an objective, can the Council provide clarity on what is actually required from development proposals? Have any requirements been viability tested and is it clear how the policy will be implemented and measured?
  - d. How will an applicant or decision-maker determine whether the policy has been met in a particular location? What is meant by the term 'communities the development relates to'? Can the Council point us to the evidence which demonstrates the specific long term needs of a community/settlement?
  - e. The supporting text to the policy (paragraph 4.4 of the Plan) identifies that the policy would apply to all major housing developments of 10 dwellings or more or an outline residential application of 0.5 ha or more in size. Whilst this reflects the definition of major development within the Framework, are the thresholds justified within the context of this Plan? Would requirements be the same irrespective of the size of the scheme and is this justified and achievable? If not, is this clear within the policy?
  - f. How would the policy apply to different forms of housing development, such as sheltered housing or extra care, and is this clear?
  - g. The supporting text at paragraph 4.5 makes specific reference to the provision of or contribution to a Community Development Officer. This is not a

requirement defined in Core Policy CP7. Is it set out in another policy and if so, is it legally compliant, justified and consistent with national policy?

Supporting older people and people with mobility issues – Core Policy DCP2

10. Core Policy DCP2 sets out the modelled demand for older person homes and supports the provision of specialist older person housing. On major housing developments it expects a range of house types, including two bedroom dwellings and bungalows. It also supports other listed initiatives and developments. It summarises the need for adapted housing as established through the LHNA.
- a. As the policy reads more like an objective, can the Council provide clarity on how the needs listed will be met through development? What does the policy actually require from development proposals and is this viable? How will the policy be implemented?
  - b. Are all major housing development sites required to deliver two bedroomed dwellings and bungalows, and if so by how many dwellings? How is this proposed to be achieved and is it justified and viable?
  - c. How will sheltered housing and extra care accommodation needs be achieved? Have needs been identified for other older person accommodation such as age-restricted general market housing?
  - d. How will an applicant or decision-maker determine whether the policy has been met in regard to criteria 1-4? For instance, how will a development be expected to increase older people's engagement in community life?
  - e. As regards the inclusion of optional standards for accessible and adaptable homes:
    - i. Does the LHNA robustly evidence an identified need in accordance with national policy (footnote 49 relating to paragraph 130 of the Framework) and the PPG?
    - ii. Does the policy accurately reflect the evidence of need?
    - iii. Whilst the policy lists the needs as percentages, how many dwellings for each category are actually needed and is this clearly identified within the Plan?
    - iv. Should the policy distinguish between the need for M4(3a) and M4(3b) categories? Has this been suitably assessed?
    - v. Does the policy take adequate account of any potential site constraints, such as topography, which may limit the suitability of a site?
    - vi. The policy is unclear how relevant development schemes will be expected to meet these needs. For instance, are 67% of all homes on

development sites sought for M4(2)? Does the 8% for M4(3) form part of this or is it in addition to the 67%? Is this justified and viable and is it clear within the policy? Or is this set out elsewhere in the Plan?

- f. Does the supporting text robustly justify Core Policy DCP2?

#### Affordable housing – Core Policy CP9

11. Questions on affordable housing are included under Matter 3 on the housing requirement. Our questions here relate specifically to Core Policy CP9, which requires at least 30% affordable housing on relevant sites above defined thresholds.

- a. Is the requirement for at least 30% of housing on relevant sites to be affordable justified by robust evidence and is it viable for all housing types including specialist older persons' housing?
- b. Why does the policy use the term 'at least' and how would provision above 30% be achieved? Is this viable?
- c. How much affordable housing will be delivered as a result of the Plan's policies?
- d. Is the requirement for sites for 4 or more dwellings, within the AONB or designated rural areas, to provide at least 30% affordable housing justified and effective? Would this mean that a site for 4 dwellings would need to provide 2 affordable units to meet the policy, effectively providing 50% affordable housing? Is this viable on these smaller sites and deliverable?
- e. The policy states that tenure, size and type of affordable housing will be negotiated on a site by site basis. Is this flexible approach justified and effective? Would varying tenures be viable?
- f. Core Policy CP9 also includes a general requirement for residential development to provide an appropriate density. Does this only relate to affordable housing? If not, is it set out in other Plan policies?
- g. The supporting text at paragraph 4.21 identifies that affordable housing provision may be subject to viability, but this is not set out in the policy. Should it be and if so, is such an approach justified?
- h. The supporting text at paragraph 4.22 states that affordable housing should be provided on site other than in 'exceptional circumstances', but this is not set out in the policy. What are the reasons for this? What would constitute 'exceptional circumstances' and is the approach justified?

#### Gypsies, travellers and travelling showpeople sites – Core Policy CP10

Core Policy CP10 seeks to safeguard existing authorised sites for gypsies, travellers and travelling showpeople and sets targets for pitch and plot provision up to 2031. The

policy provides locally set targets of up to 7 additional pitches for gypsy and traveller households and 8-12 additional plots for travelling showpeople households for the period 2016-2031. This is based on the Gloucestershire Gypsy, Traveller and Travelling Showpeople Assessment (2017) (GTAA) (EB11).

In light of the *Lisa Smith v SSLUHC* [2022] EWCA Civ 1391 judgment of 31 October 2022 regarding the interpretation of the Planning Policy for Traveller Sites (PPTS) and the application of that policy to gypsies and travellers who have ceased to pursue nomadic lifestyles, we asked whether the Council wished to review the assessment of traveller site needs (ID-02). In their response, the Council has published a new assessment, the Gloucestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (November 2022) (GTAA 2022) (ID-04) and responses to our initial questions (ID-02-SDC and ID-03-SDC).

In relation to the District of Stroud the GTAA 2022 concludes, at Table A24, a need for 22 additional pitches for the period 2021-2040, for gypsies and travellers who meet the ethnic definition. It also confirms, at Table A26, a need for 27 additional plots for travelling showpeople for the same period.

The GTAA 2022 also includes additional recommendations relating to transit provision and boat dwellers.

12. In response to the new assessment can the Council clarify how they propose to meet these accommodation needs during the plan period? In particular:
  - a. Can any space for additional pitches and plots be found within or adjacent to existing sites?
  - b. Do new sites need to be found and if so, what will be the methodology for selecting sites and the timescales for completing this?
  - c. What is the Council proposing in relation to transit provision and the accommodation needs of boat dwellers?
  - d. What changes are the Council seeking to make to the Plan in response to this new evidence?
13. Are there any unmet accommodation needs for gypsies, travellers and travelling showpeople within any neighbouring authorities and if so, how will these be provided for?
14. Is the three stage sequential approach for site selection set out in Core Policy CP10, justified, effective and consistent with national policy?
15. Are policy criteria A-F justified, effective and consistent with national policy? Is there unnecessary duplication with other Plan policies?

## **Matter 7c Other housing policies**

### New housing development – Core Policy CP8

16. This policy sets out general requirements for residential developments.
- a. Is the policy clear or does it unnecessarily duplicate other more detailed and specific Plan policies? Is it clear how the policy will be implemented and monitored?
  - b. The policy includes an expectation that relevant proposals 'should reflect the housing needs identified for that Parish Cluster area'. Is this evidence available? How does this apply to developments promoting new communities/settlements?
  - c. Are any of the wording changes suggested by representors necessary for soundness?
  - d. Overall, is the policy viable, justified and effective?
  - e. Does the supporting text robustly justify the policy?

### Meeting housing need within defined settlements – Delivery Policy DHC1

17. The policy simply permits residential development within defined SDL, subject to 'detailed criteria defined for meeting housing needs at settlements'.
- a. What are the 'detailed criteria defined for meeting housing needs at settlements'? Are these the criteria set out in Delivery Policy HC1 as referenced in paragraph 4.33 of the supporting text? If so, what is the purpose of the policy when Delivery Policy HC1 provides the detailed criteria to be met? Is there unnecessary policy duplication?
  - b. Is the policy consistent with other Plan policies including Core Policy CP3, which identifies that exceptionally development adjacent to appropriate SDL may be permitted?

### Sustainable rural communities – Delivery Policy DHC2

18. This policy supports schemes of up to 9 dwellings outside SDL at Tiers 3b and 4 settlements, subject to meeting five criteria. We've already asked some questions under Matter 2 that are relevant to this policy which may be duplicated here.
- a. Is development outside the proposed SDL necessary to meet identified needs and if so, why are site allocations in these locations not being proposed or boundaries moved to accommodate this?
  - b. Is the Plan clear as to how decision-makers would determine whether the location of proposed development 'adjoins' or is 'close to' SDL? Is the

terminology used consistent with other Plan policies including Core Policy CP3?

- c. Why has a limit of 9 dwellings been identified for these tiers? Is this justified by robust evidence? What if the identified need was higher?
- d. Are the criteria listed in Delivery Policy DHC2 justified and effective?
- e. The policy requires that a proposal 'would not lead to a cumulative increase of more than 10% of the settlement housing stock as at 2020. What are the housing stock numbers for each rural settlement and what would 10% equate to in dwelling numbers? Is this approach justified?
- f. How does the policy relate to others in the Plan including Core Policy CP3 and Delivery Policy HC4 on exception sites? Are the policies consistent or is there unnecessary duplication or ambiguity?
- g. The policy requires that any affordable housing 'will be made available for those in need with a strong local connection.' Is this approach justified? Who will determine whether someone has a 'strong local connection' and how will this be implemented?

#### Homes above shops in town centres – Delivery Policy HC2

19. Is the policy justified, effective and consistent with national policy?

#### Self-build and custom-build housing provision – Delivery Policy HC3

20. Table 13 in EB8 provides historic data for self-build and custom-build delivery since 2016. Delivery Policy HC3 supports the provision of self-build and custom-build dwellings within SDL and adjacent to SDL subject to meeting policy criteria. On strategic sites the policy requires a minimum of 2% of the dwellings to be self-build or custom-build plots, subject to demand being demonstrated.

- a. How many plots are required to meet the identified demand for this type of housebuilding during the plan period?
- b. How has the Council determined that 2% provision is appropriate to meet the evidenced demand? Is it viable and achievable?
- c. The policy states that at strategic sites, development briefs will set out how the plots will be delivered. As this is 'subject to demand being demonstrated' how will a developer and decision-maker determine whether a site needs to provide such plots? If there is no demand what happens to those plots?
- d. The policy also states that regard will be had to site-specific circumstances and local demand in determining the nature and scale of any provision. Is it clear what such site-specific circumstances would be and how they would determine the level of provision?

- e. Are any of the policy wording changes suggested by representors necessary for soundness?

#### Local housing need (exception sites) – Delivery Policy HC4

- 21. The policy permits affordable housing 'on sites well related to existing settlements' located 'close to, or adjoining, an accessible settlement with local facilities' (tier 3 or above) unless local need indicates it should be met at tier 4 settlements. The policy lists six criteria and sets out when some market housing may be acceptable as part of a scheme.
  - a. Is the policy consistent with national policy, including on rural housing, entry level exception sites, and the AONB?
  - b. Are the six criteria justified and effective? In particular:
    - i. How will criterion 2 apply if it is decided that the need is to be met at a tier 4 settlement?
    - ii. In relation to criterion 4 is it clear which 'detailed criteria' from which policies would be relevant?
    - iii. As regards criterion 6 is the approach in the policy justified and consistent with national policy and guidance? What are the reasons for specifying a maximum GIA of 100m<sup>2</sup> and removal of PD rights and is this approach justified? Are amendments to the policy necessary as suggested by representors?

#### Live-work development – Delivery Policy DHC3

- 22. The policy supports live-work development subject to listed criteria being met. Is it justified, effective and consistent with national policy?

#### Detailed criteria for housing developments – Delivery Policy HC1

- 23. The policy permits housing development (in SDL and outside SDL where permitted by other policies), subject to a list of nine criteria all being met.
  - a. Are the criteria suitably clear, justified effective and consistent with national policy? For instance, is criterion 4 consistent with paragraphs 99 and 100 of the Framework?
  - b. Is it clear how a decision-maker will determine whether a proposal meets the policy requirements?
  - c. Does the supporting text robustly justify the policy and identify where appropriate design documents can be located?
  - d. Overall, is the policy, justified, effective and consistent with national policy?



#### Community-led housing – Delivery Policy DHC4

24. The policy supports community led housing schemes. However, it reads more like an objective rather than a policy setting out clear development requirements. What is the purpose of the policy and is it justified, effective and consistent with national policy?

#### Replacement dwellings – Delivery Policy HC5

25. The policy restricts the replacement of dwellings outside SDL which is subject to five criteria being met. Is it justified, effective and consistent with national policy, including paragraph 80 of the Framework?

#### Residential sub-division of dwellings – Delivery Policy HC6

26. The policy sets out a list of considerations it will have regard to when determining the sub-division of existing dwellings into two or more self-contained residential units. However, does not provide clarity on whether residential sub-divisions would be permitted or not and what the determining requirements would be.
- a. Is the policy justified, effective and consistent with national policy?
  - b. Does the policy unnecessarily duplicate criteria within other Plan policies?
  - c. It has been suggested that the policy should include both conversion of commercial buildings and conversion of dwellings to HMO use. Are these suggestions justified and necessary for effectiveness?

#### Annexes for dependents or carers – Delivery Policy HC7

27. The policy permits annexes subject to specific criteria being met. Is it justified, effective and consistent with national policy?

#### Extensions to dwellings – Delivery Policy HC8

28. The policy permits extensions or alterations to dwellings subject to specific criteria being met. Is it justified, effective and consistent with national policy? Does the policy unnecessarily duplicate criteria within other Plan policies?

## Matter 8 Employment Provision

***Issue 8 – Does the Plan set out a positively prepared strategy for the provision of employment land to meet identified needs within the Borough that is justified and effective. Are the policies for employment development sound?***

### Employment land supply

Table 5 of the Plan (page 40) summarises the employment land supply as 79 ha for the plan period. This consists of eight new strategic employment sites, as allocated in Core Policy CP2 and individual site allocation policies.

The Employment Land Review (2021) (ELR) (EB30) identifies a land supply to meet the needs. It concludes that a realistic supply of possible employment land supply to 2040 is 105.14 ha, consisting of 14 main sites.

Table 4 of the Plan (page 37) sets out total commitments of 52.1 ha (as at April 2020) and potential losses of 40.6 ha, leaving an available supply of commitments of 11.5 ha. Deducting this from the employment requirement for the plan period of 62.4-71.8 ha leaves a residual employment land requirement of 50.9-60.3 ha.

Taking into account relevant questions under Matter 4 our queries on employment land supply are as follows:

1. Are more recent updates available on employment completions, commitments and losses since the start of the plan period?
2. Is the methodology on assessing employment land supply in the ELR justified and consistent with national policy and guidance?
3. If the ELR shows that an employment land supply of 105.14 ha (comprising of 14 main sites) is available, is it clear how the Council has determined which sites should be included in the Plan? How does this fit with the Council's methodology for site assessment and selection as set out in the SALA (EB18) and its findings (EB19-EB26)?
4. Paragraph 4.1 of the Employment Topic Paper (EB7) identifies that the level of existing commitments and Plan allocations exceeds the employment land need identified in the ENA study as 62.4-71.8ha. It states that the 'additional supply, above need levels, provides a buffer to allow for further losses of employment land, to other uses, to 2040'. What further losses is this referring to and is this approach justified?

### New employment development – Core Policy CP11

5. Core Policy CP11 supports new employment development.
  - a. In accordance with paragraph 16 of the Framework, is the purpose of the policy clear and does it avoid unnecessary duplication of other policies?

- b. Is it consistent with paragraph 82 of the Framework, particularly in relation to providing sufficient flexibility?
- c. Would the policy wording modifications in relation to providing sufficient flexibility and the inclusion of waste management infrastructure, as suggested by representors, ensure the policy was effective and consistent with national policy or would other changes be necessary to achieve this?

#### Key employment sites - Delivery Policy EI1

- 6. Delivery Policy EI1 seeks the retention of key employment sites for employment uses.
  - a. Is it clear how the list of key employment sites has been determined and is it justified?
  - b. Is the policy consistent with paragraph 82 of the Framework, particularly in relation to providing sufficient flexibility and to enable a rapid response to changes in economic circumstances?

#### Regenerating existing employment sites - Delivery Policy EI2

- 7. Delivery Policy EI2 permits the regeneration of five employment sites for mixed uses.
  - a. Is it clear how the list of sites has been determined and is it justified?
  - b. What is the reason for including the caveat 'provided that there are demonstrable environmental and/or conservation benefits' and is this justified and effective?
  - c. The policy seeks the provision of at least the same employment opportunities as existed when the employment site was previously used. Whilst this is subject to viability and site specific circumstances, how would a decision-maker determine what the previous level of employment opportunities were and the circumstances when this would not apply? Is this approach justified and effective? Is it consistent with national policy, particularly paragraph 82 of the Framework?
  - d. Would the policy wording modifications, as suggested by representors, ensure the policy was effective and consistent with national policy or would other changes be necessary to achieve this?

#### Former Berkeley Power Station - Delivery Policy EI2a

- 8. Delivery Policy EI2a seeks the retention of the former power station for employment and employment related uses, and for operations and uses associated with the decommissioning of the power station.
  - a. Is the policy sufficiently clear and effective?

- b. Are the suggested wording modifications, to secure improvements to related infrastructure and provide clarity on the distinction between the de-licensed and licensed parts of the site, necessary for effectiveness of the policy?

Development at existing employment sites in the countryside - Delivery Policy E14

9. Is the purpose of the policy clear and is the policy justified and effective? Does it unnecessarily repeat other Plan policies? Is it consistent with national policy, particularly paragraphs 84 and 85 of the Framework?

Farm and forestry diversification - Delivery Policy E15

10. Is the purpose of the policy clear and is the policy justified and effective? Does it unnecessarily repeat other Plan policies? Is it consistent with national policy, particularly paragraphs 84 and 85 of the Framework?

Provision of new tourism opportunities - Delivery Policy E10

11. Is the policy justified and effective? Does it unnecessarily repeat other Plan policies? Is it consistent with national policy, including paragraphs 84 and 85 of the Framework?

## Matter 9 Retail Provision and Town Centres

***Issue 9 – Does the Plan set out a positively prepared strategy for the provision and delivery of retail development to meet identified needs within the Borough that is justified and effective. Are the policies for retail development and designated centres sound?***

The Retail/Town Centre Planning Policy Advice (2021) (EB34) provides a ‘targeted update’ to three previous retail and town centre studies prepared for the Council in 2010, 2013 and 2017.

### Retail needs

1. EB34 provides updates to the quantitative and qualitative assessments for convenience and comparison goods floorspace forecasts. Overall, it identifies there ‘would not be an overriding need to plan for new retail floorspace across the five main settlements, as the focus should be on supporting existing provision in defined town centres.’ It does, however, recommend provision of local retail and service facilities within the larger urban extensions and/or new settlements.
  - a. Based on this approach, have retail needs been suitably assessed by robust and up to date evidence?
  - b. Does the Plan suitably provide for local retail needs within the larger strategic site allocation policies, including the proposed new settlements?

### Retail hierarchy

2. The Plan, at paragraph 5.8 summarises how the retail hierarchy has been established. Core Policy CP12 identifies that town centre uses will be located according to the retail hierarchy and lists the Principal Town Centre, Other Town Centres, District Centres, Local Centres and Neighbourhood Shopping (Lower-order Local Centres).
  - a. Is the retail hierarchy and sequential approach clearly set out within the policy? Is it justified by the evidence, effective and consistent with national policy?
  - b. Is it generally consistent with the overall settlement hierarchy categorisation and the planned growth for the plan period?

### Primary shopping areas

3. Core Policy CP12 under criterion A only refers to one primary shopping area within Stroud, yet the supporting text uses the plural term. How many primary shopping areas are proposed? Are the designations justified by robust evidence and are they clearly defined in policy and on the policies map?
4. Is the wording of Delivery Policy EI7 on primary shopping areas, justified, effective and consistent with national policy?

### Other retail and town centre policies

5. Delivery Policy EI6, seeks to protect the loss of individual shops, public houses, village halls and other community facilities located outside retail and town centre boundaries, unless three criteria are met. Are these criteria justified and effective and is this approach consistent with national policy?
6. Is Delivery Policy EI8 on town centres justified, effective and consistent with national policy?
7. Delivery Policy EI9 sets out the gross floorspace thresholds for defined settlements, for when relevant planning applications would need to submit impact assessments. At 500 sqm and 100 sqm, these are significantly lower than the default 2,500 sqm threshold level identified in paragraph 90 of the Framework. How have the threshold levels been determined and are they justified by robust evidence? Is the Plan's approach in this regard consistent with national policy?

## Matter 10 Environment

***Issue 10 – Does the Plan set out a positively prepared strategy for the natural, built and historic environment that is justified, effective and consistent with national policy? Does the Plan adequately address other environmental matters and are the policies sound?***

### Matter 10a Sustainable future

#### Core Policy DCP1 Delivering Carbon Neutral by 2030

1. Core Policy DCP1 sets a target of achieving net zero by 2030, ahead of the national target which is to achieve the same by 2050.
  - a. Is this target achievable? Is it justified and viable?
  - b. How will 'net zero carbon' be defined and measured and is this clearly set out in the Plan? How will progress towards meeting this target be monitored? On what basis will the target be measured as having been achieved?
  - c. Are all the policy requirements set out in Core Policy DCP1 justified for a strategic policy and are they achievable? How will a decision-maker determine whether the requirements have been met, for instance how will they know that green infrastructure has been maximised?
  - d. Does the policy strike the right balance between encouraging sustainable modes of transport whilst recognising that in rural areas some local residents and businesses may be more reliant on the private car? Is the policy approach consistent with paragraph 105 of the Framework?
  - e. The policy states that all new development must be designed to discourage the use of the private car, irrespective of fuel source. Does this acknowledge opportunities to encourage EV usage through the provision of, for example, a network of electric charging points across the District, including the rural area?
  - f. Does the policy provide sufficient support for the use of land for the production of food?
  - g. Would the policy requirements for new development result in developers having to build to a higher level of standards than that required by the Building Regulations (whether current or those planned to be implemented)? Are these requirements justified and consistent with national policy? What, if any, would be the implications of this for delivery of development across the District (specifically viability)?
  - h. Is the policy as a whole consistent with national policy?

### High quality sustainable development – Core Policy CP14

2. This policy states that development will be supported where it achieves the requirements listed in 14 criteria. Several requirements appear to be included in other Plan policies. Is the purpose of the policy clear and does it provide sufficient clarity for a decision-maker to determine whether proposals accord with the policy? Or does it confusingly and unnecessarily duplicate national policy and other Plan policies?

### A quality living and working countryside – Core Policy CP15

3. Under policy CP15, land outside of identified settlement development limits is treated as open countryside. The policy states that in these circumstances, development will not be permitted except where several specified criteria are complied with.
  - a. Is the wording of this policy suitably positively worded and is it sufficiently flexible to ensure that desired outcomes are achieved?
  - b. Are the criteria set out in the policy consistent with national policy, for example, on the re-use of rural buildings?
  - c. Do the criteria strike the right balance between enabling suitable development in rural area whilst seeking to prevent development that would be unacceptable? Are there additional types of development that should be included in the policy, for example essential infrastructure?
  - d. Criteria 9 of the policy limits schemes within Tier 3b, 4a or 4b settlements to 9 dwellings. Is this justified?
  - e. Overall, does the policy unnecessarily duplicate other more detailed Plan policies?

### Sustainable Construction and Design - Delivery Policy ES1

4. Policy ES1 requires development proposals to meet a number of requirements, including the achievement of a net-zero carbon standard.
  - a. Is this policy consistent with national policy and relevant Building Regulations and is it justified and necessary? In the event that Building Regulations are altered or updated, how would the policy deal with this?
  - b. Are the requirements set out in the policy achievable and viable?
  - c. Should the policy incorporate transitional arrangements? If so, why and what should these be?
  - d. What is the Stroud District Council carbon offset fund and how will it be managed and administered?



- e. Is the policy sufficiently flexible to allow for situations where the achievement of the requirements may not be possible due to the individual circumstances of a site?
- f. Is the reference to the Home Quality Mark justified?

#### Renewable or low carbon energy generation – Delivery Policy DES2

- 5. Has the assessment methodology, including the Landscape Character Assessment and the identification of suitable areas, which support this policy taken sufficient account of the Cotswold AONB? For example, has sufficient account been taken of the Cotswold AONB Management Plan (2018-23), AONB Character Assessment and AONB Landscape Strategy and Guidelines?
- 6. Are the Landscape Character Types used in the AONB consistent with those used in the Council's LCA? What, if any, difficulties may arise during the planning process if there are differences?
- 7. Do the issues set out in the policy take sufficient account of the benefits of renewable energy generation at the national strategic level?

#### Heat supply – Delivery Policy DES3

- 8. Is this policy supported by the evidence base and is it viable and deliverable?
- 9. Does the policy take sufficient account of opportunities to provide communal heating systems when considering issues relating to feasibility (as a separate consideration to viability)?
- 10. Should the policy be applicable to all site sizes? Are there particular issues relating to small and medium sites that should be taken account of?
- 11. Is the wording of the policy suitably flexible to take account of individual site circumstances?

#### Water resources, quality and flood risk – Delivery Policy ES4

- 12. Given that Defra has designated the Seven Trent Area as being under serious water stress (July 2021), does the policy incorporate sufficient water efficiency standards?
- 13. Is the requirement, where appropriate, for contributions towards surface water flood projects, including 'upstream rural SuDS projects' that are outside a site application boundary, justified?

#### Maintaining quality of life within our environmental limits - Delivery Policy ES3

- 14. The policy sets a number of criteria against which development proposals will be assessed. Some relate to environmental limits and some relate to living conditions issues (such as noise disturbance and outlook). Is the scope of the

policy justified in terms of the policy issues it seeks to cover? Is the policy effective or should it be split into two policies covering environmental limits and living conditions respectively?

15. Are the criteria set out in the policy justified and consistent with national policy, for example criteria 8 which relates to the best and most versatile agricultural land?
16. Does the policy take sufficient account of mitigation measures that might be used to make developments acceptable where there would be some level of harm, for example regarding soil resources?
17. When the policy refers to 'an unacceptable level' is it clear what is meant by this term and how development proposals will be assessed against it?

## **Matter 10b Air quality**

18. The Plan at paragraph 6.40 states that air quality within the District is 'predominantly good' but also identifies that a very small number of locations could potentially exceed the annual average for nitrogen dioxide (NO<sub>2</sub>) and fine particulation (PM10). Which locations is the Plan referring to and how have these been identified?
19. Reference is also made in the same paragraph to the Gloucestershire Air Quality and Health Strategy. Can the Council please point us to where this is located in the evidence?
20. At paragraph 6.41 the Plan seeks to minimise 'any potential air quality issue by locating development 'where there is a viable range of transport choices'. Have appropriate assessments of the effect of the planned growth on air quality been carried out to ensure that this is the case? Does the Plan provide appropriate measures to mitigate any impacts, including cumulative impacts?

### Air quality - Delivery Policy DES5

21. The policy seeks development that is 'likely to exacerbate existing areas of poorer or marginal air quality' to provide mitigation measures.
  - a. Does the Plan clearly define where these areas of poorer or marginal air quality are located?
  - b. How will a decision-maker know whether development is likely to exacerbate air quality issues?
  - c. Is it clear when a formal air quality assessment may be required?
22. The HRA report accompanying the Plan concluded that there would be no adverse effects on the integrity of the Cotswolds Beechwoods SAC, alone or in combination with other projects. However, it is understood that discussions are ongoing with Natural England and other LPAs regarding the future monitoring of air quality at this SAC. How will any recommendations for future monitoring be taken account of?
23. Does the policy take sufficient account of the potential impact of any air quality at other wildlife sites?
24. The policy provides an open list of potential mitigation measures which a development may include. It is not prescriptive. How will a decision-maker know which mitigation measures are necessary for a proposed development? Are the measures listed justified and effective?
25. Overall is the policy effective and consistent with national policy?

## **Matter 10c Natural and historic environment**

### Biodiversity and geodiversity – Delivery Policy ES6

26. Policy ES6 requires development proposals to provide a minimum of 10% net gain in biodiversity (BNG). How will this requirement take account of emerging statutory requirements in the Environment Bill regarding BNG to ensure that there is no overlap or that the policy becomes outdated?
27. Is the minimum 10% BNG requirement justified and consistent with national policy? Should the amount requested be less, or indeed greater in some circumstances such as on strategic site allocations?
28. Is the policy clear as to how 10% BNG will be calculated? Is additional information needed to make the policy effective?
29. Should the policy specify transitional arrangements for the implementation of this policy? A period of two years has been suggested. Is a transitional period justified or necessary?
30. When the provision of a minimum of 10% BNG is not achievable on a development site, the policy requires off site measures to be provided. How will this requirement be implemented?
31. The policy does not currently explicitly refer to the delivery of new areas of SANGs. Is such a reference necessary?
32. Natural England have proposed some detailed amendments to the wording of this policy regarding Habitats and the HRA process. Has agreement between the Council and NE been reached on this issue? What amendments, if any, are suggested as necessary to make the policy sound?
33. Has the Council's viability assessment made a sufficient and realistic assessment of the costs associated with implanting this policy for developers?
34. The policy states that development should not adversely affect local wildlife sites, local nature reserves, local geological or geomorphological sites or local ecological or green infrastructure networks. Is this justified and consistent with national policy? Does the policy draw sufficient distinction between the different levels of protection that apply to international, national and local sites respectively?
35. Is the policy as a whole worded sufficiently flexibly and positively to ensure that development that takes account of biodiversity and geodiversity (and complies with relevant legislation and regulations) is enabled? If not, what are the reasons for this?

### Landscape character – Delivery Policy ES7

36. Is the policy consistent with national policy relating to AONB?

37. The policy refers to the Cotswolds AONB as a whole and the types of development that may be acceptable subject to specified criteria. Is the policy as worded sufficiently detailed or should more specific mention be made of areas within the AONB? If so, would this be necessary to make the policy effective?
38. The policy states that major development will not be permitted unless it is demonstrated to be in the national interest and there is a lack of alternative sustainable development sites. In setting the bar at 'major development' is this the right one, should it be lower (for example 5 or more dwellings) or indeed higher? If so, why and on what basis?
39. Does the policy aim of seeking to retain the existing distinctive qualities of the landscape take account of the challenges presented by climate change and changes in the agricultural industry (for example changes to agricultural payments)? Can this aim be achieved and if not, why not?
40. Is the desire for development to protect or enhance the landscape character consistent with the need for planning to deliver appropriate levels of housing and jobs within the AONB?
41. Does the policy draw sufficient distinction between the approach to development within the AONB and development outside of it but within its setting? Is the policy consistent with national policy in this regard?

#### Trees, hedgerows and woodlands – Delivery Policy ES8

42. In requiring 'no net loss of hedgerow' is the wording sufficiently flexible to take account of site specific circumstances? Is the approach justified?
43. How will this requirement interact with policy ES6 and the policy regarding BNG?
44. The policy refers to the 'unacceptable loss' of trees, hedgerows and woodland etc. What criteria will be used to determine whether a loss is 'unacceptable'? Is the policy wording clear?
45. The policy also refers to 'locally valued' trees, hedgerows and woodland etc. How will the term 'locally valued' be defined and on what basis will this be determined? Will it be clear to developers and local communities what is 'locally valued' in addition to those assets which are already protected?

#### Valuing our historic environment and assets – Delivery Policy ES10

46. Does the Plan set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk, in accordance with national policy?

47. Is Delivery Policy ES10 consistent with national policy and are the criteria justified and effective? In particular:
- d. Is it clear from the wording of the policy in what circumstances archaeological assessments would be required?
  - e. Criterion 4 of the policy refers to the protection and enhancement of key views and vistas. Is the policy clear on how these terms will be defined? Is it intended to refer to those which are relevant to the heritage asset's setting or all views?
  - f. Is criterion 5 consistent with national policy, for example in its approach to the level of any harm or loss and the differences between designated and non-designated heritage assets?
48. Is the wording of the policy consistent with the recommendations in the SA to guide the form of future development and minimise harm to heritage assets (with reference to comments from Historic England)?

#### Maintaining, restoring and regenerating the District's canals – Delivery Policy ES11

49. Parts of the policy read as Council objectives. Is the policy justified and effective?
50. Is the purpose of the policy clear? Is it for proposals to carry out restoration works to the canals, or is it for other forms of development on or adjacent to them, or is it for both?
51. Is it clear what 'on the route of' and 'adjacent to' means when determining when the policy would apply to development proposals? Are the canal routes clearly defined on the policies map?
52. Is it clear what is required from development or are the requirements duplicated in other Plan policies e.g. green infrastructure, design and biodiversity?
53. Is the policy sufficiently clear about the need for canal restoration works to take account of designated biodiversity sites or core parts of the local ecological network?

#### Conversion of redundant agricultural, forestry and rural buildings

54. Does the policy take sufficient account of the need to assess effects on biodiversity and protected species?
55. Is criteria 7 of the policy justified and consistent with national policy? Specifically, the hierarchy set out and the requirement for robust evidence including marketing over a reasonable period? Under the terms of the policy, how would a 'reasonable period' be defined?

#### Equestrian Development – Delivery Policy ES9

56. Does the policy as worded take sufficient account of the keeping of horses for sport and exercise?

### **Matter 10d Design**

#### Better design of places – Delivery Policy ES12

57. In relation to Delivery Policy ES12:
- a. Is it clear what the purpose of this policy is and what it is seeking to achieve?
  - b. Is it clear how a decision maker would use this policy when determining development proposals?
  - c. Is the policy consistent with national policy and guidance on design?
  - d. How does it relate to other Plan policies which reference design and does it unnecessarily duplicate these?

#### Public art contributions – Delivery Policy ES16

58. In relation to this policy:
- a. Is it consistent with national policy and justified by evidence?
  - b. How will it be decided whether a contribution will be proportionate and on what basis?
  - c. Has the viability of this policy been fully assessed?

## **Matter 11 Infrastructure Provision and Viability**

***Issue 11 – Does the Plan set out a positively prepared strategy for infrastructure provision to meet the Plan’s development strategy and is this justified, effective and consistent with national policy? Are the policies relating to infrastructure sound? Is infrastructure provision viable?***

### **Matter 11a Infrastructure – general questions**

#### Infrastructure and Developer Contributions – Core Policy CP6

1. The policy seeks ‘to ensure that infrastructure will be in place at the right time to meet the needs of the District and to support the development strategy.’
  - a. The policy identifies the Council’s broad intentions in achieving infrastructure provision, rather than setting out clear development requirements. What infrastructure is actually sought from development proposals or is this appropriately set out within other Plan policies including the site allocations? Can the Council clarify the purpose of the policy and how a decision-maker would use it when determining future proposals?
  - b. As regards the reference to developer contributions, we are unclear as to exactly what the policy is seeking from development proposals? What contributions are actually sought and are these viable? Can the Council clarify please?
  - c. Overall, is the policy justified, effective and consistent with national policy?

### **Matter 11b Transport**

Since the submission of the Plan and the production of the Council’s Transport Topic Paper (EB6), technical updates on transport and viability have been published.

#### Definition and scope of transport infrastructure required

2. Have all essential transport infrastructure elements been identified and does the Plan adequately address these needs in its identification of the scale and location of proposed development? Has the preparation of the Plan been consistent with paragraph 104 of the Framework which states that transport issues should be considered at the earliest stages of plan-making?
3. In general terms will Core Policy CP6, the Infrastructure Delivery Plan (IDP) and other policies of the Plan, including allocation policies, ensure that necessary transport infrastructure will be delivered and in the right place and at the right time?
4. Will the mitigation measures identified be sufficient to address the highway impacts identified?



5. Is the Council satisfied that the Plan proposals would not have an unacceptable impact on highway safety or that the residual cumulative impacts on the road network would not be severe?
6. How will the Council work with infrastructure and service providers (including National Highways, developers, landowners and neighbouring authorities) to identify and address any impacts of proposed development, including through the use of contributions, CIL and through the implementation of any highway improvement schemes?

#### Demand management and sustainable travel measures – Core Policy CP13

7. Core Policy CP13 seeks to support major development subject to three transport related criteria. It also provides a further 4 criteria to be met by all development schemes. The policy also expects proposals to ‘consider all possible sustainable transport options’ before increasing the capacity of the road network and to be consistent with and contribute to the implementation of the agreed transport strategy.
  - a. Is the policy consistent with national policy which includes seeking to minimise the need to travel and promoting sustainable transport modes?
  - b. Does the policy set out clear requirements for sustainable transport provision? What is meant by the term ‘consider all possible sustainable transport options’? What are developers meant to do after they have considered such options?
  - c. Does the policy recognise that opportunities to maximise sustainable transport solutions may vary between urban and rural areas as recognised in paragraphs 85 and 105 of the Framework? How does this apply to Stroud District?
  - d. Are the criteria justified and effective? Is it clear how a decision-maker should determine future proposals against each of the relevant criteria?
  - e. Is the reference to ‘having regard to ... the Council’s adopted (parking) standards’ appropriate? Are these the standards set out in Appendix C? Is the policy clear on this and are the standards justified?
  - f. Is the requirement to be consistent with the transport strategy justified?
  - g. How does this policy relate to Delivery Policy EI12? Are the policies consistent? Is there unnecessary or confusing duplication between these policies?

#### Promoting transport choice and accessibility – Delivery Policy EI12

8. The policy seeks to promote transport choice and accessibility.

- a. The policy requires parking standards and principles for development to be provided to the adopted standards in Appendix C. Is this requirement consistent with Core Policy CP13 which only requires regard to be had to the standards? Is the policy clear and are the standards justified and consistent with national policy?
- b. How does this policy relate to Core Policy CP13? Are the policies consistent? Is there unnecessary or confusing duplication between these policies?

#### District-wide mode-specific strategies – Delivery Policy DE11

9. The policy describes what the Council's intention is in relation to working with key partners rather than setting clear policy requirements for development? Can the Council explain the purpose of the policy?

#### Protecting and extending our walking and cycling routes – Delivery Policy EI13

10. The policy includes not permitting development where it would significantly harm an existing walking or cycling route or prejudices the proposed routes as listed. What is meant by 'significant harm' and are the 8 listed routes justified? Are these clearly identified on the policies map?
11. Overall, is the policy justified, effective and consistent with national policy?

#### Provision and protection of rail stations and halts - Delivery Policy EI14

12. Is the policy justified, effective and consistent with national policy?

#### Protection of freight facilities at Sharpness Docks - Delivery Policy EI15

13. Is the policy justified, effective and consistent with national policy?

#### Provision of public transport facilities - Delivery Policy EI16

14. Is the policy justified, effective and consistent with national policy?

#### Delivery and viability

15. Does the viability evidence supporting the Plan make realistic assumptions about costs?
16. The Transport Funding and Delivery Plan (July 2022) (TFDP) identifies three transport mitigation packages. These are:

##### M5 Junction 12:

- improvements to M5 J12 (a new grade-separated junction);
- Improvements to the A38 / A430 / B4008 'Crosskeys' Roundabout; and
- Improvements to the B4008 / Stonehouse junction.

M5 Junction 14: comprising improvement to M5 J14 (a new grade-separated junction) and dualling of the B4509 between M5 J14 and A38.

A38 Corridor (This package includes the following number of individual junctions which have been identified for highway capacity improvements in the Traffic Forecasting Report (EB61)):

- A38 / Grove Lane;
- A38 at Claypits;
- A38 / B4066;
- A38 / B4066 Berkeley Road;
- A38 / Alkington Lane; and
- A38 / A4135.

Are these mitigation measures necessary and justified? Do they represent a comprehensive set of mitigation measures required to support the levels of growth set out in the Plan?

17. As regards the proposed dualling of the B4008 and new park and ride:
  - a. Should these be included in the M5 J12 mitigation package?
  - b. Is it reasonable and realistic to expect the dualling of the B4008 to be delivered as part of the Javelin Park extension site? Has a scheme been identified and costed to deliver this piece of infrastructure? Are there any implications for the delivery of the Javelin Park extension site? For example, is it necessary for this scheme to be delivered at a particular stage of the development and is that achievable?
  - c. If the new park and ride scheme is still at scoping stage does this have implications for the viability and deliverability of the Plan?
18. The TFDP sets out indicative costs for the three schemes (page 5). For the M5 J12 scheme this is £9,437,500; the M5 J14 scheme is £27,246,837; and the A38 package is £3,812,500. Are these indicative costs realistic and do they provide a reasonable basis upon which to consider the viability of delivering the growth set out in the Plan?
19. The TFDP states that following discussions with National Highways, neither the M5 J12 or M5 J14 schemes are likely to attract funding from the Road Infrastructure Strategy (RIS) in the foreseeable future. Is that assumption still valid? Have all external sources of national funding for these schemes been fully explored?
20. In the absence of national funding being available, the TFDP sets out a proposed apportionment methodology which would seek to take account of external growth from neighbouring authorities (including Gloucester, Cheltenham, Tewkesbury and South Gloucestershire). The TFDP goes on to explain that at this stage, the scale, location and nature of growth in these Districts is uncertain due to their

respective Plan's being at an earlier stage of development. Nevertheless, modelling assumptions have been made in order to take account of growth from neighbouring Districts.

- a. Were neighbouring Districts involved in discussions to develop these modelling assumptions and has any agreement been reached on this issue (such as Statements of Common Ground)?
- b. In looking at housing growth assumptions and the split between major and minor/windfall development it is noted that this was derived from housing delivery data from Stroud District. Was this a reasonable and realistic assumption to make? Are patterns of housing delivery data between Stroud and neighbouring authorities sufficiently similar to make this assumption valid?
- c. The TFDP goes on to apportion background growth between neighbouring authorities developments based on these assumptions. Table 7 sets out the results of the apportionment exercise. M5 J12 is set out as 38% Stroud and 62% from neighbouring authorities; M5 J14 is 20% from Stroud and 80% from neighbouring authorities; A38 Corridor is 60% from Stroud and 40% from neighbouring authorities. It would therefore appear that the majority of funding required for these infrastructure schemes is expected to be provided by neighbouring authorities, presumably sourced from developer contributions. Are these assumptions realistic or reasonable? Is there a realistic prospect of this funding coming forward to deliver the infrastructure required?
- d. Have discussions with neighbouring authorities taken place regarding the apportionment of these costs? Has any formal agreement been reached? How would funding for these schemes be collected and distributed? Which Council would lead the co-ordination and provision of these infrastructure schemes?
- e. How would the global figure assigned to neighbouring authorities be broken down at the individual district level?
- f. Is the level of funding that is expected to be sourced from developments in neighbouring authorities realistic and is there a reasonable prospect of it being secured during the lifetime of the Plan? If not, are there any implications for the delivery of the Plan?
- g. Are any of the schemes identified reliant on land in third party ownership for their delivery? If so have discussions with relevant land owners taken place? If necessary, have realistic acquisition costs been included when calculating likely scheme costs?
- h. The TFDP distributes the growth apportioned for Stroud District to 12 site allocations. Is the scale and distribution of costs reasonable? Is there agreement that the costs set out are reasonably accurate? Have viability considerations been appropriately considered?

- i. The TFDP states that sites delivering over 150 dwellings were considered capable of contributing towards strategic mitigation packages. How was this threshold set? Is it justified?
  - j. If agreement on the apportionment of growth to neighbouring authorities cannot be reached, or if it is found that Stroud should meet a greater proportion of the cost of these schemes would there be implications for the deliverability and viability of these allocations?
  - k. Equally, if agreement cannot be reached would failure to deliver the infrastructure schemes during the plan period affect delivery assumptions for these allocations?
  - l. Are any allocations or development reliant on the delivery of any of these schemes at a particular point during the plan period? For example we note comments from National Highways that improvements to Junctions 12, 13 and 14 of the M5 are likely to be required early in the plan period. If so, is a lack of identified funding likely to affect delivery assumptions in the Plan?
21. The Sustainable Transport Strategy (STS) Addendum (July 2022) lists 14 interventions to be included in the STS Addendum (Table 2.2). The schemes include a number of significant infrastructure projects that are referred to in the Plan including public transport for a strategic park and interchange hub scheme for M5 J12 and a new railway station (s) south of Gloucester, north of Bristol. Under funding status, all the interventions state 'still required'.
- a. Has any funding been identified to support the delivery of these interventions?
  - b. Reference is made to a Strategic Outline Business Case (SOBC) being produced for a potential rail station at Stonehouse which will test options and deliverability. What are the timescales for this piece of work and when is it expected to be completed? If the SOBC concludes that a new station would not be viable would there be any implications for the Plan?
  - c. Are any allocations or development reliant on the delivery of any of these schemes at a particular point during the plan period? If so, is a lack of identified funding likely to affect delivery assumptions in the Plan?
  - d. Are these interventions expected to be delivered during the plan period and if so how will they be funded?
22. The STS Addendum also refers to land being safeguarded for the potential rail stations at Stonehouse and Charfield. The Stonehouse site is safeguarded through Delivery Policy EI14, but Charfield is not included. Is there sufficient evidence available at this stage in the process to justify safeguarding land for these two potential stations? Are they likely to be delivered during the plan period?

23. The STS Addendum sets out a number of other proposed updates to site proposal and policies (page 15 onwards).
- a. Are these proposals necessary and justified by the evidence?
  - b. Has the effect of these requirements on the viability of the relevant allocations and policies been considered and if so what does the evidence show?
  - c. In order to ensure that the Plan is effective should the updates be incorporated into the text for the relevant allocations/policies in the Plan?
24. The STS Addendum has updated the assessment framework that fed into the modelling in order to understand the traffic impact of the site allocations on the District's highway network. One of the considerations used in the update is stated as being a greater ambition towards sustainable travel across the District and to consider the impact of new sustainable transport interventions. Table 5.1 lists the effect of the updated assumptions, with most showing a reduction in the number of trips as a consequence of the updated considerations.
- a. How was the extent of the reduction in the number of trips decided? Are the values evidence based?
  - b. Given that there is some uncertainty over the funding status of many of the sustainable transport schemes listed in the STS Addendum was it reasonable to take account of these considerations?
  - c. If the sustainable transport interventions cannot be delivered in the right place and at the right time to support the allocations, what effect, if any, would this have on the updated modelling assumptions in terms of impact on the highway network?

### **Matter 11c Other infrastructure**

25. In general terms will Core Policy CP6, the IDP and other policies of the Plan, including allocation policies, ensure that other necessary infrastructure will be delivered in the right place and at the right time? Are the requirements clearly set out and are they justified and consistent with national policy?

### Wellbeing and healthy communities – Delivery Policy DHC5

26. The policy supports proposals that include design measures for healthier lifestyles and sustainable neighbourhoods. However, it reads more like an objective rather than a policy setting out clear development requirements. What is the purpose of the policy, how would it be implemented, and is it justified, effective and consistent with national policy?

### Green Infrastructure – Delivery Policy DES2

27. Taking account of recreational pressure at existing GI sites, should the policy be more specific about the identification and delivery of new GI projects along with other mitigation measures and how these will be delivered and funded?
28. Is the policy sufficiently flexibly worded to take account of individual development site circumstances / constraints and how that might affect the feasibility / viability of delivering GI?

#### Protection of existing open spaces - Delivery Policy DHC6

29. Is the policy justified, effective and consistent with national policy?

#### Provision of new open space - Delivery Policy DHC7

30. Delivery Policy DHC7 requires new residential development to provide open space and sports facilities in accordance with specific standards set out in the policy. The supporting text states that these standards are based on the Council's Open Space, Green Infrastructure, Sport and Recreation Study (2019) (EB41 and EB41a-j).
  - a. Are the standards justified and is the approach effective and consistent with national policy? Are the open space typologies clearly distinguishable or do some overlap?
  - b. How will a developer or decision-maker determine what provision needs to be made for each future proposal?
  - c. Are the delivery mechanisms justified and effective? Is it clear how any off-site contributions will be sought?
  - d. How does the application of the final sentence in the policy accord with the statutory tests for planning obligations?

#### Providing sport, leisure, recreation and cultural facilities - Delivery Policy EI11

31. The policy permits new facilities or improvements to existing facilities subject to 7 criteria.
  - a. How would a decision-maker determine whether disabled access and bus, cycle and walking links were 'adequate' (criteria 3 and 5). What are the benchmarks?
  - b. Criterion 4 requires on-site cycle/vehicle parking to be provided to the adopted standards. Are these the standards set out in Appendix C? Is this requirement consistent with Core Policy CP13 which only requires regard to be had to the standards? Is the policy clear and are the standards justified?

c. Overall, is the policy justified, effective and consistent with national policy?

**Matter 12 Monitoring and Implementation**

***Issue 12 – Is the Plan deliverable, capable of being effectively monitored and is it viable?***

1. The Plan, at paragraph 7.12 states that a monitoring framework will be prepared to assess the performance of the Plan for the plan period. Has this been produced and if not when will this be made available?
2. What are the key indicators and targets proposed to be in the monitoring framework and how will the Council ensure that these effectively measure and monitor progress on delivery of the Plan's policies? What actions will be taken if targets/policies are not being achieved?
3. Are the glossary terms set out in Appendix E of the Plan consistent with national policy?
4. Overall, is the Plan viable?