

1. INTRODUCTION

1.1 GENERAL OBJECTIONS TO INTRODUCTION CHAPTER

The Objections

Intro/543/2311	Government Office for the South West
Intro/397/1329	Stroud District Task Force
Intro/424/1542	Stroud & Gloucestershire Green Party

Summary of Objections

(a) There is no environmental appraisal of the plan.

Inspector's Reasoning and Conclusions

1.1.1 I understand from the Council that an Environmental Appraisal had been developed at the Draft Deposit stage of the Plan, but it was not in a publishable format in time to go out for public consultation. This document was revised and was published in conjunction with the Revised Deposit Plan (see CD/L6). I consider these objections are far from being answered by this explanation.

1.1.2 There is clear guidance given in the Government's Planning Policy Guidance Note 12 – Development Plans. The current version was published in December 1999, but the advice in the version extant at the time of the Draft Deposit stage contained similar provisions. The essence of the advice is that there should be an iterative process of environmental appraisal of the plan as it evolves, being a transparent process by which the plan's contents is tested and changes are made to effect the best environmental balance. To quote paragraph 4.18 of PPG12 – “At key stages in development plan preparation (eg prior to the deposit of the plan, and at the deposit/revised deposit) the appraisal of the plan should be subject to public consultation, with the responses to consultation then used to inform the next stage of plan preparation. The deposit version of the plan should not include the full environmental appraisal within it, but it should be clear from the reasoned justification/explanatory memorandum of the plan what elements of the appraisal have informed the policies and proposals in the plan.”

1.1.3 In deciding what action to recommend the Council to take, I bear in mind that there is not yet a District wide plan in place, and that in my view it is of paramount importance that this Plan should proceed to adoption as quickly as possible. The environmental appraisal published with the Revised Deposit Plan goes some way to achieving the evaluation which is needed, and together with the results of the consideration of objections and my recommendations, means that the Plan can be regarded as being environmental sound at this stage. But what I must emphasise is that the review of the Plan and its policies and proposals must be underpinned by an iterative process of environmental appraisal, which will publicly demonstrate how and why decisions are taken, and which allows the results of consultation on the appraisal to be taken into account.

1.1.4 In responding to these objections, the Council has produced an Additional Suggested Change seeking to clarify how the Environmental Appraisal has informed the current version of the Plan by inserting a new explanatory paragraph in the Introduction, following paragraph

1.3.11, as follows:

“Environmental Appraisal

Local authorities are required to prepare their development plans in a way that comprehensively and consistently takes environmental considerations into account. Such a mechanism for doing this is the appraisal of the plan against environmental criteria. An environmental appraisal weighs up and reports on the environmental and other costs and benefits of the plan. Its purpose is to demonstrate that these concerns have been fully integrated into the plan-making process. The value and purpose of environmental appraisal is:

- *To clarify the environmental objectives of the plan*
- *To understand the implications for the environment of any policy option, or interacting group of policy options*
- *To enable the implications for different, wide ranging, and potentially conflicting aspects of the environment to be taken into account*
- *To demonstrate to users of the plan how the policies have had regard to environmental matters*

The principles of such an appraisal process have been built into the preparation of the Stroud Local Plan. The Council aims to produce a plan led by environmental and other considerations of sustainability. An Environmental Appraisal was developed and published for public consultation alongside the Revised Deposit Local Plan. It serves to identify those policies that will be successful in achieving this aim and those that will fail to achieve it in certain aspects. The plan’s policies have been appraised in respect of their environmental, social and economic impacts at both local and global level. As and when major modifications are made to the policies of the Plan, the Environmental Appraisal will be reviewed.”

1.1.5 I agree that the Plan should contain a reference to environmental appraisal, making reference to the Environmental Appraisal that was published with the Revised Deposit Local Plan, and referring to the continuing appraisal of the Plan as in is reviewed. I therefore recommend that the Plan be modified broadly on the lines of the Council’s suggested change, set out above. However, because of the reservations which I have about the extent to which the plan making process has been rigorously appraised in the way intended in Government advice, as alluded to in paragraph 1.1.1 above, I am recommending that the first sentence of the final paragraph, after the bullet points, should be omitted.

RECOMMENDATION 1.1

Modify the Introduction to the Revised Deposit Plan in accordance with Additional Suggested Change set out above, save that the first sentence of the final paragraph, after the bullet points, should be omitted.

1.2 PARAGRAPH 1.1.1

The Objections

Intro/para. 1.1.1./424/1544 Stroud & Gloucestershire Green Party

Summary of Objections

- (a) There are problems with integration of policy areas particularly of transport issues. This does not provide a clear framework or co-ordination for infrastructure as implied in the Plan. It does not fulfil the aims of the Structure Plan.

Inspector's Reasoning and Conclusions

1.2.1 In response to this objection, it must be stressed that the Local Plan does not stand alone as a guide for the future development of the District, and it is also necessary to read the Plan as a whole and not to regard the policies as separate parts. However, the need to integrate the strategy and policies of the Plan with the Local Transport Plan (CD/S4) has been acknowledged by the Council, and references to this document were improved and land use integration was introduced in the Revised Deposit Plan. Revisions to the Transport Chapter have also helped to address this point and the Council refers, for example, to the introduction of Policy T1, which provides criteria for testing the transport implications of all applications for development. I am therefore satisfied that the Plan provides a suitable framework for this topic.

1.2.2 With regard to the comment on meeting Structure Plan aims, which in this objection are of a very general nature, I consider the extent to which the Local Plan gives sufficient recognition to the provisions of the Structure Plan later in this report.

RECOMMENDATION 1.2

Make no modification to paragraph 1.1.1.

1.3 PARAGRAPH 1.3.9

The Objections

Intro/para. 1.3.9./558/2457 Robert Hitchins Limited

Summary of Objections

- (a) The Local Plan does not conform with the Structure Plan. The major land use allocation at Hunts Grove does not conform with Adopted Structure Plan policies. Policy MU1 should be deleted.

Inspector's Reasoning and Conclusions

1.3.1 The issue of non-conformity of the Local Plan with the Structure Plan is the subject of an objection from the County Council and the matter is raised in greater detail in objections dealt with later in this report. I refer to my conclusions and recommendations on this matter

where it is dealt with in the Strategy and Housing Chapters. There are no modifications which need be made to paragraph 1.3.9 of the Plan.

RECOMMENDATION 1.3

Make no modifications to the Plan in response to this objection.