

2. STRATEGY

2.1 GENERAL OBJECTIONS TO STRATEGY CHAPTER AND PARAGRAPHS 2.6.1 TO 2.6.4

The Objectors

See Appendix 1 to this chapter

Summary of Objections

There are a number of general themes running through the objections to the Strategy. These can be summarised as:

- a) The focus of housing development in the Central Severn Vale is not justified in terms of national, regional and strategic guidance. In particular the strategy does not conform or fit with strategic guidance.
- b) There is a lack of clarity and definition in the settlement hierarchy.
- c) The strategy does not satisfactorily address regeneration issues for the District's towns and villages.
- d) There is imbalance between housing and employment provision.
- e) The strategy should focus more on 'brownfield' sites.
- f) Local housing needs will not be met.
- g) The strategy will lead to urban sprawl.
- h) There is inadequate testing of the strategy.

See Appendix 2 for a more detailed summary of objections and an item by item response.

Inspector's Reasoning and Conclusions

2.1.1 The Strategy of the Plan is set out in Section 2.6. There were considerable changes made to the text of the Strategy between the Draft for Deposit November 1999 version of the Plan and the Revised Deposit version published in October 2000. Subsequently, the Council produced a number of Proposed Changes in June 2001. For the sake of clarity, a version of the Strategy in the final form intended by the Council (subject to my recommendations) was set out as an Appendix to the Council's response to these objections. For the same reason I set out this text in Appendix 3 to this chapter of my report.

2.1.2 I now deal with each of the objection themes in turn.

a) The focus of housing development in the Central Severn Vale is not justified in terms of national, regional and strategic guidance. In particular the strategy does not conform or fit with strategic guidance.

2.1.3 The Local Plan must be in conformity with the Structure Plan. The Gloucestershire Structure Plan (GSP) was adopted in November 1999, having been prepared in the context of the 1994 version of RPG 10. A Third Alteration of this Plan is underway taking account of the 2001 version of RPG 10. Although the County published a Deposit Draft on 5 November 2002, this was after the relevant sessions of my inquiry, and it has not been the subject of comment by Objectors or the District Council. At the late stage which Stroud District Local Plan has reached in its preparation, I do not believe that any interest would be served by considering whether this Plan's Strategy is in conformity with that emerging Alteration. In this regard, nothing which I have seen suggests to me that there is a need to do anything more than begin the review the Local Plan (in accordance with the new requirements for Local Development Documents) following adoption.

2.1.4 Whilst the County Council has issued a Statement of Non-Conformity with the GSP, it wished to have this considered within that part of the Inquiry dealing with the Hunts Grove allocation (H1[MU1]), as the objection is concerned with the issues of 'the timing and the scale' of this allocation (see Chapter 5 of this report, Housing - Section 5.14). Therefore I do not consider the formal non-conformity issue here.

2.1.5 In terms of whether the Plan's Strategy is in accord with strategic guidance, the policies of the extant adopted GSP are the starting point. Before looking at the GSP's policies, I should refer to the comments and recommendations made by the Panel holding an Examination in Public (EiP) into the First Alteration. A number of Objectors have made extensive reference to various recommendations and comments made by the Panel in its report to Gloucestershire County Council. However, I take the view that there is very little weight that should now be given to the Panel's report. The Panel's role was to recommend to the County Council modifications which it considered should be made to the deposited version of that plan. Upon receipt of its report, it was for the County Council, as strategic plan making authority, to decide the precise form and content of the plan which it would adopt. It is the adopted GSP which is the strategic element of the statutory development plan, and it is this to which the Stroud District Local Plan should conform. The Report of the Panel following the EiP is now mainly of academic interest in helping to understand the process which the adopted GSP went through in reaching its status as part of the statutory development plan, but is of little value in interpreting the policies or putting a particular gloss on them. There is one comment of the EiP Panel which I will refer to, however. That is that they saw no justification for a strategic gap to the south of Gloucester, nor did they support the continued expansion of the City much beyond the city boundary. Stroud's proposals for a southern expansion of the Gloucester urban area, in the light of the more detailed study that naturally results from the preparation of a local plan, cannot be said to be at odds with the Panel's second point in my view, and obviously does not contravene the first point.

2.1.6 In much the same way, a number of Objectors make reference to the Consultation Draft and the Deposit Draft of the Structure Plan. Both of these have been well and truly overtaken by subsequent events, including the new (September 2001) RPG10 and the March 2000 version of PPG3. Apart for the GSP policies themselves, it is RPG10 and PPG3 which are of greater importance than the historical documents leading to the adoption of GSP.

2.1.7 Whilst all of the relevant policies of the GSP must be borne in mind, 2 policies in

particular are pertinent. Policy S1 states:

“The bulk of new development should be accommodated within and adjacent to the County’s larger towns at scales and locations that:

- *maintain and enhance the predominance of Gloucester and Cheltenham as the focus for new development in the County,*
- *maintain and make them more attractive places in which to live and work,*
- *meet transport demands in safe and energy efficient ways primarily aiming at reducing the need to travel,*
- *conserve natural resources of minerals, best and most versatile agricultural land, biodiversity and high quality landscape,*
- *promote the regeneration of appropriate town centres,*
- *avoid the coalescence of existing settlements,*
- *conserve the historic and built environment.”*

And since the thrust of objections to the Strategy is in respect of the location of new housing development, Policy H.4 states:

“Most residential development will be provided in the Central Severn Vale. Development should be provided in locations where employment, leisure, commercial and community facilities can be integrated and where there are opportunities to maximise the use of public transport. In providing for residential development priority will be given to development within Gloucester and Cheltenham and then to locations adjacent or close by which are or can be easily and conveniently accessed by means of transport other than the private car...”

In those areas of Tewkesbury Borough and Stroud District outside the Central Severn Vale development will mostly be provided within and adjacent to the existing towns of Tewkesbury/Ashchurch and Stroud/Stonehouse....”

2.1.8 Whilst there is as yet no clear delineation, either verbal or on a map base, I understand that commonly the Central Severn Vale (CSV) is considered to comprise the PUAs of Gloucester and Cheltenham and those parts of Stroud and Tewkesbury Districts in closest proximity to the PUAs. Clearly Policy H4 indicates that Stonehouse and Stroud are not located within the CSV, and certainly there is no dispute that Hunts Grove (Plan Policy H1 – MU1) falls within the CSV.

2.1.9 Whilst most of the objections to the Plan’s strategy concentrate on the location of housing sites, the other major use of urban land, employment, should also be considered. This is dealt with in GSP in Policy E2. The relevant parts of Policy E2 are:

“Most employment development will be in the Central Severn Vale. Brockworth and Quedgeley are identified as key strategic employment locations where land will be provided in locations where housing, commercial, leisure and community facilities can be integrated and wherever possible improved, including maximising opportunities to use public transport.

In providing for employment uses priority will be given to development within Gloucester and Cheltenham and then to locations adjacent to or close by which are or can be easily and conveniently accessed by means of transport other than the private car, in accordance with Policies S.1 – S.7.

..... In Stroud District outside the Central Severn Vale, development serving the needs of

the District will be provided mostly in Stroud/Stonehouse. Development in other settlements will only be provided where environmental and other constraints can be satisfactorily accommodated in accordance with Policies S.1 – S.7.”

2.1.10 Before drawing any conclusions on the question of conformity with strategic guidance, Objectors refer to more than the structure plan policies, and it is also necessary to take account of Regional Guidance and what is said in relevant national policy.

2.1.11 The review of Regional Planning Guidance was undertaken in broadly the same time period as the preparation of the Local Plan and resulted in the publication of a new RPG 10 in September 2001. This RPG identifies a regional spatial strategy, with a hierarchy of settlements for meeting development needs across the region. In Policy SS 2: Regional Development Strategy, the strategic guidance includes the point that the Region's 11 Principal Urban Areas (PUAs) offer the best opportunity for accommodating the majority of development in the most sustainable way - the aim should be to concentrate most development at the PUAs. It then continues by saying that, where this is not possible, development should be in the form of planned urban extensions to the PUAs in sustainable locations with good access to the urban area by public transport, cycle and foot. Policy SS 3: The Sub-Regional Strategy includes an objective to seek a more sustainable pattern of development than in the past by strengthening the roles of PUAs, fostering urban renaissance, curbing unsustainable outward expansion and aiming for greater self-containment in towns within commuting distance of the PUAs.

2.1.12 Since the point of the objections I am dealing with in this section is the focus of housing development, the principle national policy can be found in Planning Policy Guidance Note 3: Housing (PPG3), published in March 2000. The most apposite advice to the strategy in the PPG makes it clear that new development should be located so that it meets housing requirements in the most sustainable way; that a systematic approach to site development potential should be adopted; that the search sequence should start with the re-use of previously developed land within urban areas as identified in an urban capacity study and then look at the potential for urban extensions.

2.1.13 The second tier of the search sequence set out in paragraph 30 of PPG3 is to consider urban extensions. In undertaking this element of the sequential search, it will be necessary to follow the settlement hierarchies set out in RPG and the Structure Plan. The final sequential tier is to seek development around nodes in good public transport corridors: but in a district such as Stroud where public transport provision is relatively poor, this does not seem to me to be applicable

2.1.14 The advice in this section of the PPG then goes on to point out that the potential and suitability of housing sites should be assessed against the following criteria: the availability of suitable previously developed sites; their location and accessibility to jobs, shops and services by non-private car modes, and the potential for improving such accessibility; the capacity of existing and potential infrastructure; the ability to build new communities; and the physical and environmental constraints on development land, including contamination, stability, flood risk, etc. In determining the order in which sites should be developed in accordance with these criteria, the presumption will be that previously developed land should be developed before greenfield sites.¹

2.1.15 Paragraphs 65 - 67 of PPG3 are also to the point. These state that not all development can take place within urban areas, and that where development has to take place outside urban areas, the most sustainable option should be utilised. Furthermore, any substantial new development should not consist exclusively of housing, but must be planned as a

¹ This précis and that in the preceding two paragraphs is taken from paragraphs 28 - 32 of PPG3, to which reference should be made for the full text

community, with adequate shops, employment and services. Planned extensions to existing urban areas are likely to prove the next most sustainable option after building on appropriate sites within urban areas, especially where it is possible to utilise existing physical and social infrastructure (or where new public transport provision can be planned into the development), and there is good access to jobs, schools, shops and leisure facilities.²

2.1.16 Clearly the current PPG3 was issued well into the process of preparing the Plan: that is one reason for many of the changes that occurred between the deposit and revised drafts. But as a result of its guidance, and the complementary best practice guide "Tapping the Potential" (CD/N31), the Stroud Urban Capacity Study was undertaken during the Spring of 2001 (CD/L47). That study, carried out in co-operation with representatives of the construction industry, appears to me to be a sound and comprehensive study of sites on previously developed land in locations which are generally sustainable. I consider that, in terms of finding sites suitable for allocation in the Plan, it can be regarded as having identified all that is recognisably available. Of course there will be windfall sites that emerge, for such capacity studies are never likely to identify all land that is suitable and that will be made available for redevelopment during the Plan period. Nevertheless, it can be taken as exhaustive in the sense that the shortfall of housing sites to meet Structure Plan requirements for the District will have to be found further down the sequential search for sites set out in PPG3.

2.1.17 The Urban Capacity Study revealed one major redevelopment opportunity and a few small sites additional to those previously identified in the local plan preparation process. It has resulted in the increased housing and employment allocations for a major mixed-use development in Dursley. The other sites that were identified have also been incorporated into the Plan proposals. (These changes are indicated in the Council's Proposed Changes document (CD/L5). I am told that, of the land allocations now proposed in the Plan, some 53% are on previously developed land. In a predominantly rural district such as Stroud, this is a satisfactory achievement. In addition, the evidence is that many of the dwellings completed and committed through extant planning permissions, and those that will arise through windfall provision, have and will involve the redevelopment of previously used land and property. Therefore the Council expects, reasonably it seems to me, that in accommodating the 9,400 dwellings allocated to it through the Structure Plan, the Government target to provide 60% of new housing on previously developed land will be substantially met within the District. Furthermore, this supports my conclusion, contrary to the argument of some objectors, that housing has been provided across the district, and that the role of the towns and larger villages has been reinforced.

2.1.18 However, that also means that there remains a need to identify (having taken into account expected 'windfalls' – a topic dealt with elsewhere in this report) further development sites on greenfield land in order to meet the GSP housing and employment requirements for the District. Since Stroud District shares its border with Gloucester City, I agree with the Council that it follows from consideration of the combination of the GSP, RPG10 and PPG3 that it is necessary to first consider the potential for urban extensions to (the PUA) Gloucester, within the Central Severn Vale, before looking for urban extensions to Stroud (or Stroud/Stonehouse). Therefore, I consider that the allocations at Hunts Grove³ and Brockworth are justified. Furthermore, since structure plan Policy H5 specifically requires the local plan to make provision for a major urban extension south of Brockworth, and since the Structure Plan's target for housing will not be met without these 2 sites, they should be regarded as strategic sites to which high priority attaches.

2.1.19 It will be seen from other chapters of this report, particularly the Housing Chapter,

² Again reference should be made to the full text.

³ See also the detailed reasoning in the Housing Chapter of this report dealing with Hunts Grove and the competing major omission sites.

that I have largely supported the Council's strategy *as it has been implemented in its policies and proposals*. From this it will be apparent that I consider that, to the extent that there is a focus, the focus of housing development in the Central Severn Vale is justified in terms of national, regional and strategic guidance. However, I have to draw on conclusions elsewhere in this report in order to answer this issue (see in particular Chapter 5 of this report, Housing - Section 5.14). This is because I find that the Plan's Strategy, as set out in Section 2.6, is not clear and well defined. I next deal with the arguments about this.

2.1.20 Before doing so, however, there is one other topic raised in connection with this issue. This is in relation to the ability of the District to meet its affordable housing needs, following from the requirement of GSP Policy H7 that "Provision should be made to meet the needs of those unable to compete in the housing market. Such provision should meet a demonstrable local need...". It is said that the latest Local Needs Housing Survey commissioned by the Council identifies Stonehouse and Stroud as being the parishes with the highest proportion of affordable housing needs, whilst Hardwicke has a very low level of such need. The conclusion that I am invited to reach is that directing growth towards Hardwicke results in affordable housing need not being met where the needs exist and where they can be met in a sustainable manner close to proposed new and existing employment.

2.1.21 I deal in more detail with matters relating to affordable housing in the Housing Chapter of this report. In respect of the Strategy, it seems to me that the Plan has to seek to accommodate a number of policy objectives that do not necessarily pull in the same direction. But fundamentally I agree with the Council: it cannot be assumed that all affordable housing need can be provided in the parish in which it is identified. Hunts Grove is a sustainable location, and therefore suitable for affordable housing as for any other element of housing provision. Linkages which potential occupiers have with Stonehouse and Stroud, and the journeys that these are likely to generate, are likely to be far outweighed by journeys that relate to work, education, shopping, and much of leisure-time, arising from the home location. Whilst existing ties to a locality have to be considered, modern policy requirements are bound to lead in some instances to people having to live a little distance from their roots.

b) There is a lack of clarity and definition in the settlement hierarchy.

2.1.22 As a starting point I consider that it is useful to analyse the content of Section 2.6 - The Strategy, in the form that the Council put to me as the version which it would like to see adopted (Appendix 3 to this chapter). Paragraph 2.6.1 introduces the section with reference to the strands of over-arching policy which forms the background, and which it indicates are in the preceding sections. However, apart from a section on sustainable development and one on forecast levels of growth taken from the Structure Plan, there is no explanation of the strategic policy with which the Plan's strategy must conform, nor the regional and national policies which are material.

2.1.23 Paragraphs 2.6.1a – 2.6.1b provide a brief historical view, pointing out that development has been dispersed in the past and that there is a present need to address the existing pattern of development in the light of current national, regional and strategic policy. It then states that the role of the District's main settlements and the major influences of Gloucester and Cheltenham are outlined.

2.1.24 There then follows, under a number of sub-headings, passages which are mainly descriptive of the present role of various parts of the District and various settlements, rather than being a clear and concise statement of the strategy to be followed. It is also confusing as a strategy I find, because, having dealt with Stroud Urban Area (leaving aside for a minute the

arguments about Stroud/Stonehouse), it goes on to a sub-heading 'Principal Settlements', and then only deals with Stonehouse: although paragraph 2.6.1j ends by saying that "Stonehouse should be regarded as one (my underlining) of the District's principle settlements as referred to in the Structure Plan. It does not explain what role in the strategy principal settlements should play⁴, nor does it make clear whether the Council recognises any other principal settlement. Having left the sub-heading of Principal Settlements, the next sub-heading is Cam and Dursley. Towards the bottom of the first paragraph dealing with these combined towns we are told that they together are 'the main principal settlement serving the South Vale area of the District'. This of course could be taken to indicate that there is one or more other principal settlement serving the South Vale which is not "main".

2.1.25 Having dealt with Cam and Dursley, the section continues under the sub-heading 'Small Towns and Larger Villages'. The analysis mainly concentrates on the recent decline of village services and facilities, but then continues with a statement about the allowance that has been made for limited growth in small towns and larger villages, without, in my opinion, any clear indication of a coherent strategy. This lack of coherence, it seems to me, becomes more apparent at the end of paragraph 2.6.1.l.b where the small towns and larger villages appear to be comprehensively listed as: "Berkeley, Eastington, Kings Stanley, Kingswood, Leonard Stanley, Minchinhampton, Painswick, Sharpness, Whitminster and Wotton-under-Edge". The following paragraphs (2.6.1m – 2.6.1v) then deal with a description of the present role and function, and an indication of likely development opportunities in the following settlements: Nailsworth, Wotton-under-edge, Berkeley, Kingswood, Sharpness, Minchinhampton, Kings Stanley, Leonards Stanley, Painswick, Eastington, and Whitminster. It will be seen that the first of these, Nailsworth, is not mentioned in the list of 'small towns and larger villages', although it is included in the 'small towns and larger villages' set out in Paragraph 2.6.2, as is Newtown which is not included in the paragraph 2.6.1.l.b list. Nor does Newtown have any explanatory text in 2.6.1m – 2.6.1v. I do not find this a clear explanation of the strategy upon which the Plan is based.

2.1.26 As a result of this analysis I consider that the whole of the strategy section 2.6.1 – 2.6.4, and indeed the whole of the Strategy Chapter, needs to be re-cast and made more concise. I see no need, in an adopted local plan, for there to be such extensive explanation of the sources of background policy, etc. Indeed, it would be better, in my opinion, for the draft Plan to have been more concise: it is possible to argue that a draft plan's strategy and policies need to be explained and justified at some length, but this could equally well be done in background documents. Guidance in PPG12 emphasises the need for plans to be succinct: in my view the Strategy can be presented as little more than a set of bullet points. In Appendix 4 to this chapter, I set out my indication of how this could be done. It is not meant to be the final word on drafting, bearing in mind the time constraints on my reporting time, and the fact that this approach to the chapter was not discussed at the inquiry. However, I would impress upon the Council the need for a clear but brief strategic introduction to the Plan's policies.

2.1.27 The hierarchy of settlements proposed by the Council, and used in my Appendix, differs from the GSP policies which have only 'Rural Settlements' (Policy S4) below 'Principal Settlements'. However, in the case of Stroud District I agree with the Council that there are rural settlements large enough and having a role in their locality which make them worthy of defining as 'Small Towns and Larger Villages' leaving a considerable number of rural settlements which

⁴ Although it does carry a footnote saying "*Principal Settlements are required to be defined by Structure Plan Policy S2 to "form the focal points for a scale of development which was consistent with the character and function of the settlement, and supports local services and the social and economic well-being of local communities". The supporting text states: "Development at principal settlements will be at a much smaller scale than development in the main urban areas."*

justify no more than the scope for very limited infill in addition to any affordable housing 'exception sites'. These latter settlements should not be subject of dispersed development opportunities, for reasons of sustainability. I next turn to the arguments about the individual levels of the hierarchy.

STROUD URBAN AREA

2.1.28 The extent of Stroud District's 'Urban Area' has been a matter of considerable controversy: the Plan restricts it to Stroud whilst Objectors, in line with the GSP indication 'Stroud/Stonehouse', say the two towns should be regarded as one. Much of the argument centred on whether there is a significant gap separating the two, and whether they have the same role and character. In my judgement the District Council is right about there being a degree of separation and difference in character between the two, but it is wrong in its conclusion of their role in strategic terms. I, and no doubt anyone else applying thought to it, can identify where Stroud ends and Stonehouse begins. Similarly the two can be recognised for the differences which they display. But I consider that they nevertheless function as part of a single urban area, each supporting the other.

2.1.29 Indeed the urban area goes wider than the limits of these two towns, and this is hinted at in the GSP Key Diagram. Even on Stroud Plan's Proposals Maps there appears to be some recognition of such an urban area: on the North and South Maps there is the legend "Stroud Urban Area Inset". The Stroud Inset (which does not carry the full title) includes Stonehouse (including Stroudwater/Oldends Lane Industrial area), Stroud Town⁵, Thrupp, Brimscombe and Nailsworth, although it puts the Woodchesters into its own inset. I consider that all these are indeed part of the extent of the Stroud/ Stonehouse Urban Area, and my inclination is to agree with the extent as shown diagrammatically on the GSP Key Diagram.

2.1.30 In this context, it is noteworthy that the Urban Capacity Study included Thrupp, Brimscombe, Woodchester and Nailsworth within its scope. It is not a compact urban area but its elongated and somewhat straggling nature arises from its geomorphology and the industry that historically developed along the valley floor; and its constituent parts act as a whole, providing in particular for housing and employment, as well as many other community and social facilities. The inhabitants of this area have a level of accessibility to a range of higher order facilities, such as supermarkets, hospital, secondary schools, employment, town centre uses, railway stations, etc, which is typical of an urban area. Within and immediately adjoining this Urban Area much of the Plan's housing and employment allocations are found.

2.1.31 The inter-relationship and inter-dependency of this urban area is borne out in the Council's own evidence, given when resisting the omission site West of Stonehouse. In that evidence attention was drawn to the balance of employment and economically active in the wider area, including Stonehouse, Stroud and the Stroud Valleys.

"Historically the industry of the Stroud valleys has been the 'engine room' of the Stroud area and provided many job opportunities. However, the decline in manufacturing is rapidly changing this situation. The balance of jobs available in the area is declining when set against the numbers of economically active residents in the area. Table 2 below sets out the balance for the wards that comprise the most populated parts of the Stroud Valleys. For comparative purposes, data for Gloucester City is also included at the bottom of the table. The data is sourced from the most recent Government statistics available as given on the National Statistics website (www.neighbourhoodstatistics.gov.uk).

⁵ By which I include Ebley, Cashes Green, Dudbridge, Cainscross, Rodborough, Uplands and Bowbridge.

Table 2: Numbers Economically Active and Employee Jobs by Ward, 1998

Ward	Econ Active	Employee jobs
<i>Wards along the Stroud valleys from Chalford to Stonehouse</i>	<i>17,500</i>	<i>12,100</i>
<i>Stonehouse</i>	<i>3,600</i>	<i>4,900</i>
Stroud Valleys & Stonehouse Total	21,100	17,000
Gloucester	53,700	58,200

This clearly shows that there are fewer jobs available than people able to work in the Stroud Valleys. This imbalance contributes to the out-commuting from the area, particularly to the Gloucester and Cheltenham area (the Principal Urban Areas that form the focus of the Central Severn Vale).....Allocation of employment land in the most appropriate locations is made through policy E3. However, due to the nature of the Stroud Valleys, there are few sites along the valleys that are suitable for new employment use, the main allocation being at Stonehouse. This major industrial area helps serve the employment needs beyond Stonehouse into the Stroud urban area and its environs.”

2.1.32 The Revised Deposit Draft Plan included a subsection of the Strategy headed ‘Stroud Valley Settlements’ (paragraph 2.6.1n). This recognised that there are a number of settlements⁶ within the Stroud Valleys of varying scale and function that form the wider hinterland of Stroud Town. This subsection is now intended by the Council to be omitted by virtue of the Proposed Changes (CD/L5). A number of Objectors consider that this paragraph should be retained, subject to a revised text to recognise that some of these settlements are capable of accommodating more development, as they consider that these Stroud Valley settlements have a particular form and function. Since I regard the majority of these settlements as part of an urban area spreading out from Stroud, I do not consider that it is appropriate, or necessary, to identify them in any other way. But my assessment of this urban area does not include Brownhill, Bussage, Chalford, Eastcombe, Manor Village or France Lynch. It is true that these are sizeable settlements which have seen considerable development in recent years, but this has tended to be in the form of simple housing estates of a dispersed nature, built mainly to a low density, and I see them as being different in character and function from the settlements which I identify as being part of the Stroud Urban Area.

2.1.33 In my view they are not generally suitable for the sort of development which the Plan allocates in Trupp and Brimscombe, although Chalford has a Key Employment site identified under Policy E1 [EK1] within the historic development of the Golden Valley. This safeguarding of an existing employment area is appropriate: it provides employment potential

⁶ Thrupp, Brimscombe, Chalford, Eastcombe, Box, Bussage, Brownhill, North and South Woodchester, Manor Village and France Lynch.

for the housing of Chalford, etc., but I would see no justification for adding additional residential development on the back of it, nor do I see a justification for any further employment: it is just too far from the core of the Stroud Urban Area. As a result of my analysis, I do not regard it as appropriate to single out these settlements for any special mention or nomenclature, and paragraph 2.6.1n should be omitted in its entirety: it is sufficient that they have settlement boundaries.

PRINCIPAL SETTLEMENTS

2.1.34 Turning to Principal Settlements, I agree with one of the Objectors that it is difficult to fit the complexities of the real world into a simple hierarchy. There are significant differences between individual Stroud District settlements which do not fit into a homogenous set, perhaps especially a difficulty at the Principle Settlement level. What must be looked for are settlements which are of a significant size and perform an important role in terms of the services provided to surrounding populations, which means that they should be identified as the focus for the provision of housing, employment and other development, consistent with their individual character and function. To be identified at this level of the hierarchy they should have these characteristics and be capable of serving the planning function of reinforcing existing services and providing for new development which furthers the aim of making the District function in a more sustainable manner.

2.1.35 A necessary starting point is policy S2 of GSP and its Explanatory Memorandum. The essence of GSP Policy S2 (ignoring the grammar) is:

“Principal settlements should be identified ... which ... form the focal points for a scale of development ... consistent with the character and function of the settlement, and supports local services and the social and economic well-being of local communities. They should therefore be:

- a. accessible to the community they serve and well related to public transport and the highway network; and*
- b. defined to ensure that the social and economic needs of all rural areas can be met, taking into account their location relative to other centres and environmental considerations....”*

The Explanatory memorandum includes:

“5.6.6 This policy, when read with other policies of the Plan, contributes to providing a strategic framework for the settlement hierarchy, by addressing development issues in principal settlements. By focusing development at principal settlements (i.e. principal settlements form focal points for a scale of development) this is a more sustainable approach towards accommodating development than dispersing it among the villages. Development at principal settlements will be at a much smaller scale than development in the main urban areas....

“5.6.9 Development that takes place in the principal settlements should be of a scale which is consistent with the character and function of the settlement, also with its setting in the landscape, and support local services, including the social and economic well-being of communities. However, a balance will need to be struck between the need for development and the interests of conservation.”

2.1.36 It is apparent from these extracts from strategic policy that Principal Settlements are suitable as focal points for development of a scale between that of urban areas and the more limited development which can take place in smaller towns and larger villages. The latter is that which is essentially to fulfil their own needs and that of a more limited surrounding area. Having concluded that Stonehouse should be regarded as part of the Stroud Urban Area, that only leaves Cam/Dursley as a Principal Settlement at this level in the Council's strategy.

2.1.37 **Cam and Dursley** are conjoined, and in general planning terms can be regarded as a single entity. They were recognised in the Plan as the 'main principal settlement serving the South Vale area' and I consider that there can be no argument with that – taken together they have a population about 14,000, many facilities, including important employment, and further opportunities for sustainable development. Together they are a service centre to a local catchment.

2.1.38 **Berkeley** is the main contender for additional inclusion as a Principal Settlement. Berkeley (with a parish population of only some 1,830)⁷ has a good range of shops, a post office, a bank, and a wide range of other social and community facilities. It clearly serves as a service centre for the surrounding part of the South Vale, in particular Sharpness/Newtown, and should be recognised in the settlement hierarchy in order to seek more sustainable development in the future. It is constrained because of historic landscape, flooding and power lines. I understand that there is potential to improve public transport through the market towns initiative. I consider that it is suitable for a level of growth in keeping with its role and character, recognising its service centre function, in particular related to the existing and potential employment at Sharpness. In this connection it is important to take into account the fact that Sharpness, and the nearby Berkeley Power Station, have limited residential development and that Newtown/Sharpness has very little in the way of community facilities, and are not suitable for much further residential development. Since Berkeley is the largest urban settlement in the south-west of the Plan area, and has this important role as a service centre for its rural surroundings and the Sharpness port/employment area, I consider that its status as a Principal Settlement is justified. I deal with how development can be added to the town, bearing in mind the constraints that I have referred to, when dealing with omission site OS016 in the Housing chapter. In my opinion, apart from Cam/Dursley and Berkeley, there are no other settlements in the District which warrant being given that status, although some of the small towns have an important role in serving and acting as a focus for a more limited surrounding area.

SMALL TOWNS and LARGER VILLAGES

2.1.39 I consider that it is useful to identify this level of settlement in the strategy. There are a number of small towns and larger villages in the District which are not of sufficient size and importance in terms of the area which they can sustainably serve to be regarded as Principal Settlements, yet which have the ability to absorb a certain level of new development and to provide some services to the surrounding area. I identify these below, with an indication of my reasoning and the level of development which they are likely to be able to absorb.

2.1.40 **Wotton-under-Edge** also acts as a service centre of its immediate rural community in the South Vale. It is a sizeable settlement in its own right, with a good range of shops and other facilities. It acts as a service centre for Kingswood in particular, to which it is linked by regular bus services. Kingswood is only about 1 km from Wotton-under-Edge, and jointly they have a population of some 7,000. Wotton is also constrained by environmental factors, as it lies on the Cotswold escarpment and is within the AONB. Again it has potential under the market towns initiative. I consider that it is suitable for a modest level of growth integrated into the town and in keeping with its role and character, but not sufficient to regard it as a Principal Settlement.

2.1.41 **Minchinhampton** (parish population 5,260) has 14 shops and a post office, a bank, and a considerable number of community and social facilities. It is, of course, situated between 2 of the Stroud Valleys, and so its hinterland is very much proscribed. Nevertheless, it is a

⁷ There is a very useful Table (Table 2: Existing Facilities and Parish Populations) included in the evidence on behalf of a number of Objectors by Ms Alison Brown in proof BP-04. I have rounded parish populations where I have quoted from this table.

community capable of much self-containment, and is sufficiently near to the Stroud urban area to benefit in terms of sustainability from this juxtaposition. With journeys into and out of the Urban Area so short, in my judgement it is a sustainable settlement which should thus be recognised at this level. Set against this is the fact that it is entirely within the AONB. Provided care is taken to integrate new development into the town, it is suitable for some growth.

2.1.42 **Painswick** is not a large settlement (parish population 3,000), but it serves a hinterland and a considerable tourist trade. It has a good range of shops and other commercial/social facilities, and regular bus service connections with Stroud and Gloucester. It has a capacity, albeit fairly limited, to absorb some further development.

2.1.43 **Kings Stanley** and **Leonard Stanley** have built up areas which adjoin each other. They are only about 1³/₄ miles from the major employment area at Stonehouse. They effectively form a single planning unit, and are well served by community facilities and services, and have regular bus services to Stroud and Gloucester. Apart from being bounded to the east by the AONB, they are not constrained by environmental designations. I agree with the Council that together they form a suitable focus for low level growth commensurate with their character and role.

2.1.44 I next come to settlements which I have not so far dealt with, but which the Council regarded as suitable to put into this category. **Nailsworth** is of a similar scale and has a similar range of facilities as Wotton. However, I consider that, as described above, it is more appropriate to consider it as part of the Stroud Urban Area, and in my opinion it should not appear as a separate settlement under this heading.

2.1.45 **Eastington** has a population of about 800, and is comprised mainly of post-war residential development. It has a small range of facilities and has seen considerable recent growth. It is unconstrained by environmental factors, but it is close to a motorway junction, its proximity to Stonehouse and the employment opportunities provides just enough justification for a modest allocation in the 'Small Towns and Larger Villages' category.

2.1.46 **Whitminster** has a population of only some 500 persons. And does not have much beyond a primary school, and a shop on the wrong side of the A38. It has undergone considerable growth in the last 10 years. It is also unconstrained by environmental factors, but in my judgement, since it is primarily a residential dormitory largely relying on higher order settlements for shopping, leisure, employment and education, its location within easy access of Junction 13 of the M5 motorway makes it unsuitable for an allocation: development could not be regarded as sustainable. It should retain a settlement boundary as an 'Other Settlement'.

2.1.47 Following paragraph 2.6.2 in Appendix 1 (the Strategy as now proposed by the Council), there is a paragraph (set out in bold type in the version provided at the inquiry) which may be intended to be a policy, but which I take to be merely a summing-up. It includes **Kingswood**, and **Newtown/Sharpness** (the first mention of Newtown). Newtown/Sharpness are important for the port and existing and potential employment. Kingswood is a substantial village, having a relationship to nearby Wotton, and an importance in employment terms. For these reasons Newtown/Sharpness and Kingswood rightly come within the category of 'Small Towns and Larger Villages'.

OTHER SETTLEMENTS

2.1.48 The Council has defined smaller villages, with only basic facilities and services, as suitable for a level of growth which can be obtained through windfall provision on infill plots and affordable housing on 'exception' sites. To that end they have been defined with settlement boundaries. I agree with this approach.

c) The strategy does not satisfactorily address regeneration issues for the District's towns and villages

2.1.49 The regeneration of the District's towns and villages is one of the aims of the Plan's strategy, expressed in paragraph 2.5.2 as "To reinforce the role of the District's towns and key villages by enhancing their vitality and viability." At paragraphs 2.6.14 to 2.6.16 of the RLP, the Council's approach to the regeneration of the main town centres of Stroud and Dursley is discussed. The vital component of the regeneration strategy, which I support, is that the catchment populations of these are increased. The aim to regenerate towns and villages more generally has to be balanced with other aims, such as protection of important environmental assets and the guidance of development to the most sustainable locations.

2.1.50 The most specific point made in the objections is that the location of development on the edge of Gloucester (Hunts Grove) will do nothing to help the regeneration of Stroud's towns and villages. Of course, this is not the aim or reason for that allocation. Parallel to the Hunts Grove allocation the Plan making process has sought the development of sites close to Stroud town centre, both within the urban area and as potential extensions to it. I understand that the Council still believes that the best sites to assist the regeneration of Stroud town are those in closest proximity to it. This aim of seeking sites within the urban areas of the district, including Cam/Dursley, has, post-deposit of the Revised Plan, been achieved through the Urban Capacity Study. The result of that study is that all identifiable urban sites, suitable and likely to become available for development, have been allocated. In addition to its housing allocations within Stroud urban area, the Council has also identified other development sites in Stroud at Merrywalks, Far Hill and Cheapside that are aimed at providing other forms of development to assist the regeneration of the town.

2.1.51 The Council has to operate within the framework of national, regional and strategic policy guidance. Having allocated as many sites as possible involving the redevelopment of previously used land within the urban area, at Principal Settlements and within the District's Small Towns and Larger Villages, national, regional and strategic policy makes the search for potential urban extensions the next priority for achieving sustainability. The first focus for such extensions in Stroud District is at Gloucester: following that is Stroud urban area

2.1.52 I understand that the Council has also considered a number of potential extensions to the Stroud urban area proposed through the plan preparation process and has determined that there are no acceptable sites for urban extensions within close proximity to Stroud town centre. This is largely on the grounds of perceived harm to environmental assets. A number of 'omission sites' have come forward as objections to the Plan which I deal with, and in respect of which I make recommendations, in the Housing chapter of this report.

2.1.53 In respect of these arguments, the major proposal put forward by objectors as an alternative to Hunts Grove is that for 1500 dwellings on land west of Stonehouse. I deal fully with that omission site within the Housing chapter, where it will be seen that I do not find that it is preferable to the Council's proposals. I am not convinced that it would do much to regenerate Stroud and in addition it would have an unacceptable environmental impact. The site access lies some 8 kilometres from Stroud's town centre, but within 1 kilometre of Junction 13 of the M5. If implemented, the proposal would be more likely to operate as a home for commuters using the facilities and services of Gloucester, Cheltenham and Bristol than as a generator of people who will use the services and facilities of the main Stroud urban area. In addition it would add to the imbalance between employment opportunities and the economically active population.

2.1.54 With regard to Cam and Dursley, the District's second highest concentration of population, the latest changes to the Plan identified in the Proposed Changes document (CD/L5)

will greatly assist the regeneration of that market town. The opportunity has been taken to promote a major mixed-use development adjacent to the town centre on the site of the Lister Petter factory. In providing for about 600 dwellings and at least 1,000 jobs the redevelopment of this site is expected to be a major boost to the town. It will be seen that, elsewhere in this report, I have supported these proposed changes.

2.1.55 I am told that the Council's approach to regeneration cuts across many areas of the Council's work and is outside the scope of the Local Plan. An 'expression of interest' in the Government's Coastal and Market Towns Initiative has been made, through which it is hoped to secure further funding towards regeneration work across a number of the District's larger towns. Again I am told that work is also being undertaken on the Government's Rural Areas Initiative to secure funding for schemes within the smaller towns and larger villages of the District. In respect of smaller villages, the need to seek 'sustainable' development locations means that development opportunities cannot be dispersed. This is one level where competing interests simply cannot be accommodated, and development cannot be catered for beyond providing a tightly drawn settlement boundary within which very modest opportunities might be found, or adjacent to which 'rural exception sites' may be proposed.

2.1.56 I am satisfied that the Plan's Strategy, as I am recommending it to be modified, addresses the regeneration issues across the district.

d) *There is imbalance between housing and employment provision.*

2.1.57 In addressing this issue, a number of matters must be taken into consideration, starting with the existing relationship between employment and housing. There is already considerable out-commuting from many of the District's settlements. The number and type of jobs available within these towns and villages does not match their resident workforce. The gradual decline of manufacturing industry has exacerbated the imbalance, since many of the larger settlements have traditionally depended on such industry as their source of local jobs. High car ownership and the reduction of public transport services following bus deregulation have seen greater dependence and use of the car. Greater personal mobility and the relative lack of job opportunities within the District has led to the increase in out-commuting from the District. The nearby economic growth centres of the Central Severn Vale (Gloucester and Cheltenham) and Bristol (particularly the northern fringe of the city) and, to a lesser extent, Swindon and Bath attract high numbers of workers from the District. I therefore agree with the Council that it is necessary to seek to retain employment and foster growth within the District's towns, and to bring new industry to them, whilst not compromising the most valued parts of their environments.

2.1.58 In my opinion, the strategy rightfully responds to these issues by focusing most housing closest to the area of economic growth, in the Central Severn Vale, and as close as possible to town centres to assist regeneration. Employment needs are addressed at those settlements where out-commuting is a feature and to promote the use of integrated transport around the District's port. This approach is necessary to address the current imbalance between employment and housing rather than exacerbate the problems and add to the levels of commuting already prevalent in the District. It has to be recognised that a land use plan can only address the problems of imbalance between existing and future residents and local employment opportunities: it cannot precisely match the two, and it certainly cannot ensure that workers choose a home near their employment, or take-up employment close to home. There are many complex connections between home and place of employment, especially in households with more than one economically active person. Seeking a better match between housing and

employment is inevitably a gradual process. I consider that the Plan is moving this process in the right direction.

2.1.59 Most of the tables put into the inquiry showed the distribution of dwellings to include completions and commitments, as well as allocations. However, there is nothing which the Plan can do about completions, nor about commitments unless they are allowed to expire and then are sought to be renewed. It is the allocations by which, at this point in the Plan period, the Plan can influence the continuing development of the District. This is an important point in the circumstances of this Plan, where central government guidance and regional and strategic policies have been evolving over the period during which the Plan has been gestating. Earlier policies in the District, which amounted to approving the dispersal of development, have now been changed in accordance with a search sequence aimed at achieving sustainable development. Therefore, in considering whether there is an imbalance between housing and employment provision, it is the allocations for housing and employment which are the most instructive. I have therefore constructed the following table which shows the broad relationship between housing and employment allocations distributed across 5 levels of spatial distribution. In relation to the employment allocations, it also needs to be borne in mind that there are also areas subject to 'Employment Land Protection' policies, which generally speaking are within or close to centres of population where the resident economically active/employment opportunity balance is not satisfactory.

Table 1 – Distribution of Housing and Employment Allocations indicating distribution in Settlement Hierarchy set out in Sub-Section b above

	Central Severn Vale	Stroud Urban Area	Principal Settlements	Small towns/ Large Villages	Rest of District	Total
<i>dwellings</i>						
<i>numbers</i>	2,000	430	920 ⁸	264	30	3644
%	54	12	25	7	1	100
<i>employment</i>						
<i>hectares</i>	5.2	21.7	33.2 ⁹	2.2	-	62.3
%	8.3	34.8	53.3	3.5	0	100

% figures do not tally due to rounding

2.1.60 Looking at Table 1, it will be seen that 54% of housing allocation are in the Central Severn Vale, in accordance with the strategy. This is accompanied by only 8.3% of the employment land allocations, but this reflects the reason for an urban extension to the Principal Urban Area of Gloucester: Gloucester has a wide range of facilities available within sustainable travelling distance and mode, including employment opportunities.

⁸ I have recommended Berkeley to be a Principal Settlement. This figure includes an assumption that Berkeley will have an allocation in accordance with my recommendation in the Housing Chapter of this report.

⁹ In this figure I have added the 17.4 ha allocated at Sharpness, because of the special justification arising from the port, to Berkeley, since it is closely linked. This figure is therefore included in this column. Also within this figure is the employment element of the Lister Petter site. The Lister Petter site (MU3) is now intended to provide 1000 jobs, but no indication of the number of hectares for employment is set out. I have added the figure of 4.2ha taken from Table 1:Land Budget for Masterplan set out in Document CD/L52a.

2.1.61 At the next level, Stroud Urban Area has 12% of housing allocations, which on the face of it, is rather low. But account must be taken of the fact that, by February 2002, about 1960 dwellings had been completed or were committed within this area, which means that, by the end of the plan period, Stroud Urban Area will have had about 27% of housing development, excluding 'windfalls'. Windfalls are also likely to be found to a large extent within this area, so that the share of housing development within the main urban area of Stroud district will be something approaching 30%. This compares with some 35% (rounded) of the allocated employment land, and that seems to me to be a very reasonable balance. Given that there is at present an imbalance between economically active and employment opportunity within this area, it is right to seek to achieve a higher amount of employment, and it could be said that more employment land should have been allocated. But two things militate against this: firstly, allocating land does not ensure that it is developed, so delivering jobs, and secondly, environmental constraints must be recognised. I consider that the relationship here is about right.

2.1.62 Moving on to the Principal Settlements, there is 25% of housing allocations with 53% (rounded) of the employment allocations. These figures arise from two exceptional circumstances, not entirely related to the position of Cam/Dursley and Berkeley in the hierarchy. The first is the housing numbers related to the Lister Petter site, which I deal with in a later chapter of this report. The second is the allocation of employment land at the port of Sharpness. This employment allocation arises from the particular need to provide opportunities in this location where there is scope to build upon the transportation advantages of a sea and canal port with a rail link. The juxtapositional relationship which Sharpness shares with Berkeley justifies this employment being included in the Principal Settlement column of the table.

2.1.63 At the Small Towns/Large Village level there is a small percentage of both housing and employment land: I see nothing to criticise about a lack of balance here. There is, in effect, rightly no balance to be struck in the 'Rest of the District': there is minimal housing land allocated, and no employment allocations.

2.1.64 I deal with the objections which relate specifically to the housing/employment balance arising in the Hunts Grove proposal, and the arguments which relate to this topic at the West of Stonehouse omission site, in the Housing chapter of this report.

e) ***The strategy should focus more on 'brownfield' sites.***

2.1.65 Upon the publication of Government guidance on the approach to urban capacity studies, "Tapping the Potential", the Council undertook the Stroud Urban Capacity Study in co-operation with the private sector. It acted upon the findings, and new sites and increased capacity identified in the study were incorporated into the latest changes to the Plan.

2.1.66 However, the capacity for brownfield redevelopment in the District is finite. The opportunities are limited and I agree that renewal cannot continue at the pace required to match the demand for new development. It is inevitable therefore, that greenfield sites will continue to be needed for development. I consider that, subject to my detailed recommendations elsewhere in this report, the allocations have gone as far as they can to focus on brownfield land at present. Should new brownfield opportunities arise as windfall developments, provided that they are suitable in terms location, scale and nature, the strategy allows for them to come forward. If necessary, a future review of the Plan will address this situation.

f) ***Local housing needs will not be met.***

2.1.67 The starting point for the District is that about half its forecast housing needs, as set out in the GSP, arise from in-migration. That is, of 9,400 dwellings allocated to the District, 4,500 (48%) derive from people moving in from elsewhere in the country or from further afield. That is not local need in any sense other than it is a need which falls to be met within the District.

2.1.68 This leaves 4,900 dwellings required to meet 'local needs' – arising mainly from natural change in the population and from the changes to household size. These needs arise over the whole Plan period from 1991 to 2011 and will appear over the whole District. Already part of that need has been met by the completions of, and commitments for, dwellings in the District that totalled just under 5,000 dwellings at 1 January 2001. The Local Plan makes allocations, excluding those that already form commitments, for 3,590 dwellings. Of these, the 45% that lie outside the Central Severn Vale will also contribute to meeting 'local needs' in 'local' areas. The final element of housing supply that will partly address local need is the windfall figure of 860 dwellings, which again are likely to be almost wholly within the existing local communities.

2.1.69 I therefore conclude that the strategy (as I recommend it be modified), which takes into account the provision over the whole plan period, will not compromise local needs provision. The Hunts Grove allocation, together with that at Brockworth, help to achieve the GSP aim of focusing growth in the Central Severn Vale. Through the Plan's strategy, the dwellings provision to be achieved outside the Central Severn Vale will be more than 70% of the 9,400 dwellings required in the District.

g) The strategy will lead to urban sprawl.

2.1.70 The phrase 'urban sprawl' refers to an uncontrolled and ill-thought outspread of development away from urban areas. It is to describe development which has occurred at the edges of towns and cities without sufficient thought to making sustainable communities, and many of those developments have often been characterised by poor design.

2.1.71 Up-to-date government policy promotes urban extensions as the next most sustainable location for development after the re-use of brownfield land and property in our towns and cities. With the forecast growth unable to be accommodated on 'brownfield' sites in the District, the use of some greenfield sites extending into countryside is unavoidable. In PPG3 guidance is provided urging that substantial new development should be planned as a community with a mix of land uses; poor design should be rejected; good layout and design should be demonstrated in development proposals. The design of developments proposed in the Local Plan is intended to be strictly controlled to ensure high standards of design and integration into and with existing communities. The policies on design in the Built Environment Chapter of the Plan and in the Residential Design Guide are there for the Council to apply. My expectation is that the Council will apply those policies, and the other policies of the Plan, with due diligence. It is clear that the two major urban extensions proposed will be subject to agreed design principles contained within development briefs. They will be well designed and planned as communities. I do not accept that the Plan's Strategy represents, or will result in, urban sprawl.

h) There is inadequate testing of the strategy.

2.1.72 It is the Council's case that, in practical terms, the principle way in which the strategy will be tested is through the process of implementation - monitoring – review. I am told that monitoring procedures are already established for some aspects of implementation – notably the progress of housing development. And in order to provide more comprehensive monitoring and to improve consistency of information, a regional approach is being developed. Council officers are involved in the development of those monitoring systems. The information obtained will help guide future reviews of the Plan, its policies and proposals.

2.1.73 It is also the Council's case that the broad theoretical testing of the strategy against the Plan's aims and objectives has been undertaken in the process of Environmental Appraisal. However, at the inquiry I was told that there are no records of that testing which can be produced. I remain sceptical of the amount and thoroughness of any such testing.

2.1.74 To quote from PPG12: Development Plans (paragraph 4.17 – 4.18):

“Guidance on the environmental appraisal of development plans is given in *Environmental Appraisal of Development Plans: A good practice guide* (DOE, 1993). This sets out a framework which local authorities can adapt to their own particular circumstances. The appraisal should:

- apply to all types of plan;
- apply to all policies and proposals;
- be part of the plan preparation process; and
- be a process of identifying, quantifying (where appropriate), weighing up and reporting on environmental effects of those policies and proposals.

“The appraisal process should be an important element of every stage of the development plan process. The whole process should be iterative, so that the authority finish the process with a clear set of environmental objectives which inform each part of the development plan. It should be clear from the process how and why policy and proposal options have been chosen. At key stages in development plan preparation (eg prior to the deposit of the plan, and at 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 deposited 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.” (My underlining)

2.1.75 Picking up the points that I have underlined, the appraisal process is important at every stage, should be iterative, should be subject to public consultation, and should be reported. It is clear to me that this Plan has not had the benefit of a full environmental appraisal as required by the advice in PPG12.

2.1.76 PPG12 goes on to say (paragraph 4.19):

“To start the appraisal process local authorities will need to be aware of the nature of the environment in the area the plan is to cover. Most local authorities will already have detailed knowledge of this, but it would be worth consulting bodies such as the Environment Agency, English Nature (on the implications for wildlife and on opportunities to foster biodiversity through the development plans process), the Countryside Agency (for landscape and other issues), and English Heritage (for the historic environment) and other relevant bodies for up-to-date information....”

I accept that the Council has undertaken a considerable amount of work such as that envisaged

in this paragraph, and I make no criticism of it in this respect.

2.1.77 The point which now must be addressed is: what are the consequences of the lack of a full and proper environmental appraisal as described in paragraphs 4.17 and 4.18 of PPG12? Should I recommend that the Council starts again? I think not. The District has been long enough without an adopted local plan, and we are on the verge of a new system of Local Development Frameworks being brought in. The most important thing, bearing in mind that the objection and inquiry process itself is rigorous in looking at sustainability and environmental matters, is that the Council adopts a Local Plan. And this should be in the quickest possible time, in order to achieve the necessary and desirable development in the District, and to provide a level of certainty to the communities and developers alike.

RECOMMENDATION 2.1

Modify Charter 2 of the Plan, Strategy, in accordance with my conclusions above and the suggested text in Appendix 4 to this chapter.

2.2 PARAGRAPH 2.2.

The Objections

Strat/para. 2.2.0./397/1317	Stroud District Task Force
Strat/para. 2.2.1./543/2244	Government Office for the South West
Strat/para. 2.2.1./408/1366	Hardwicke Court Estate
Strat/para. 2.2.3./424/1546	Stroud & Gloucestershire Green Party
Strat/para. 2.2.3./409/1382	Buchanan Partnership
Strat/para. 2.2.4./577/2499	NHS Executive South West

Summary of Objections

- (a) A fuller explanation of the principles of sustainable development is needed that takes account of the Government's broad objectives and recognises and reflects the interrelationship between social, economic and environmental considerations.
- (b) Previously developed land may occur at locations outside the main urban areas. The best use of existing urban land and property and maximising the re-use of brownfield sites across the District should be an objective.

Inspector's Reasoning and Conclusions

2.2.1 The revisions to the text of this section, which were made to the revised Plan, address the points made about the principles of sustainable development. However, it will be seen from the previous section of this chapter that I do not regard it as necessary to spell out the background policies and guidance that underlies the Plan's strategy, policies and proposals. It is enough that the Plan reflects these principles, and that has now been tested at the inquiry.

2.2.2 As to the question of addressing the potential of previously developed land beyond the main settlements, these may well not be appropriate on sustainability grounds. Even if I had thought it appropriate to include a full explanation in the text, I would not have recommended making the addition sought.

RECOMMENDATION 2.2

Make no modification to the Plan in response to these objections.

2.3 PARAGRAPH 2.3.

The Objections

Strat/para. 2.3.0/1/0152	Gloucestershire County Council
Strat/para. 2.3.0./308/0856	Ministry of Agriculture Fisheries and Food (MAFF)
Strat/para. 2.3.11./558/2458	Robert Hitchins Limited
Strat/para. 2.3.5./415/1498	Redrow Homes (SW) Limited
Strat/para. 2.3.7./415/1499	Redrow Homes (SW) Limited
Strat/para. 2.3.7./558/2416	Robert Hitchins Limited
Strat/para. 2.3.7.a/415/3489	Redrow Homes (SW) Limited
Strat/para. 2.3.9./553/2344	Moira Woodward
Strat/para. 2.3.17./555/2362	Environment Agency (Planning Liaison)
Strat/para. 2.3.17./502/2084-CW	British Waterways
Strat/para. 2.3.18./424/1549	Stroud & Gloucestershire Green Party
Strat/para. 2.3.18./499/2074	The Company of the Proprietors of the Stroudwater

Summary of Objections

- (a) Text in this section should be strengthened or clarified to cover a number of detailed points:
- (a) Role of the historic environment.
 - (b) Role of agriculture
 - (c) Role of watercourses in the landscape, as opportunity for leisure and commercial traffic and for public water supply
 - (d) Role of cycle routes
 - (e) The strength of the economy of Stroud
 - (f) The relative importance of various industrial centres.
 - (g) Places where benefits from greater self employment and service sector employment will arise
 - (h) How the strategy will bring about improvements to the social and physical infrastructure and fabric of the Stroud Valley
 - (i) Role of Stroud and Stonehouse as linked settlements

Inspector's Reasoning and Conclusions

2.3.1 These objections primarily relate to details of the text of this section of the Plan. To some extent they have been overtaken by changes between the Deposit draft and the revised version of the Plan. However, it will be seen from the previous section of this chapter that I do not regard it as necessary to spell out the background to the Plan's strategy. I have recommended that the Statement of the strategy should be expressed in a much more succinct

form. Nothing in these objections leads me to think that there is a need for the adopted Plan to embrace such a detailed explanation of the background.

RECOMMENDATION 2.3

Make no modification to the Plan in response to these objections.

2.4 PARAGRAPH 2.4.

The Objections

Strat/para. 2.4.0./415/1501	Redrow Homes (SW) Limited
Strat/para. 2.4.1./558/2417	Robert Hitchins Limited

Summary of Objections

(a) No reference is made to independent estimates of projected employment demand as compared with demographically derived forecasts of labour supply.

Inspector's Reasoning and Conclusions

2.4.1 The Council's response to this is that independent estimates of projected employment demand are not available at district level. The sources look at county level and above. Against this, it is said for objectors that, although predicting employment growth is difficult for small areas, Cambridge Econometrics undertake such exercises down to regional and county level, and such models can be adapted for even smaller scale units such as Stroud District.

2.4.2 Whether such projections can be commissioned, and to what accuracy, is a matter which I shall leave in the air. The fact is that the Plan is based on the material that the Council has available. What the Council has done, however, is undertake its own Business Land and Premises survey in November 1995 (CD/L27) – updated in June 2001 to review the Council's Economic Development activity. Reference is made to this in the Employment Chapter. The update indicated that the type of premises sought varied with a very even spread between industrial estate, business park, new build, extension and converted mill. Only 11% indicated a preference for a greenfield site.

2.4.3 I regard this as a satisfactory basis on which to build the strategy and the more detailed policies and proposals on employment. There is nothing in these objections which causes me to make any different recommendation on the Strategy.

RECOMMENDATION 2.4

Make no modification to the Plan in response to these objections.

2.5 PARAGRAPH 2.5.

The Objections

Strat/para. 2.5.2./597/2569 Pitchcombe Parish Council
Start/para. 2.5.2./1/0153 Gloucestershire County Council

Summary of Objections

- (a) No reference to conservation of the natural beauty of the landscape.
- (b) The historic environment is not mentioned.

Inspector's Reasoning and Conclusions

2.5.1 The Council points out that that both these points are dealt with in bullet point 8 of paragraph 2.5.2. This in turn is reflected in the opening paragraph of my recommended text at Appendix 4 to this chapter.

RECOMMENDATION 2.5

Make no modification to the Plan in response to these objections.

2.6 PARAGRAPH 2.6.4f and g

The Objections

Strat/para. 2.6.4.f/415/3506 Redrow Homes (SW) Limited
Strat/para. 2.6.4.g/558/3811 Robert Hitchins Limited
Strat/para.2.6.4g/415/3507CW Redrow Homes (SW) Limited
Strat/para. 2.6.4.g/577/3849 NHS Executive South West

Summary of Objections

- (a) Should acknowledge that some of the previously developed land in the District is located in rural areas where its redevelopment would be unsustainable in terms of travel patterns that may arise.
- (b) No reference should be made to land remaining in "productive use" as such land should not be considered for redevelopment in the first place.
- (c) Allocated greenfield sites should not be the subject of phasing.
- (d) If a previously unidentified brownfield site becomes available for redevelopment in the plan period, this should also be developed before remaining greenfield allocations are used. This principle should be highlighted in this section of the Plan.

Inspector's Reasoning and Conclusions

2.6.1 The revisions to the text of this section, which were made to the revised Plan, address some of the points made, and my recommendation about redrafting the chapter overcomes some of the others. However, as will now be clear, I do not regard it as necessary to make this chapter as discursive as proposed by the Council.

2.6.2 As to the point that there should be no phasing of Greenfield site, I cannot agree. It is clearly in accord with the strategy of bringing forward previously used land as a priority that greenfield sites should be subject to a phasing policy.

RECOMMENDATION 2.6

Make no modification to the Plan in response to these objections.

2.7 PARAGRAPH 2.6.5 and 2.6.7

The Objections

Strat/para. 2.6.5./556/2392	J S Bloor (Newbury) Ltd
Strat/para. 2.6.5./300/0822	Eastington Parish Council
Strat/para. 2.6.7./558/2421	Robert Hitchins Limited

Summary of Objections

- (a) Object to roll forward of previously allocated employment sites into this plan. They are not sustainable, do not provide real variety and choice of sites and will not contribute to a healthy economy. The Sharpness allocations will remain undeveloped.
- (b) The requirement to find 100 hectares of employment land is excessive.
- (c) Should acknowledge the contribution that employment at Stonehouse makes to the local economy.

Inspector's Reasoning and Conclusions

2.7.1 The roll forward of employment sites is addressed within the employment chapter at paragraph 4.8.1. In my opinion, it is within the employment chapter that this issue should be addressed, rather than in the strategy. As far as Sharpness is concerned, it is sufficient here to record that I understand that the Council reviewed the allocations against 8 different criteria, and these allocations are considered in more detail in the employment chapter of this report.

2.7.2 The figure of 100 hectares is laid down in strategic policy.

2.7.3 The Stonehouse point is too detailed, in my view, to be dealt with in the strategy chapter.

RECOMMENDATION 2.7

Make no modification to the Plan in response to these objections.

2.8 PARAGRAPH 2.6.8 to 2.6.11

The Objections

Strat/para. 2.6.8./415/3508	Redrow Homes (SW) Limited
Strat/para. 2.6.8./558/3812	Robert Hitchins Limited
Strat/para. 2.6.8./556/2393	J S Bloor (Newbury) Ltd
Strat/para. 2.6.9./556/2394	J S Bloor (Newbury) Ltd
Strat/para. 2.6.10./577/2503	NHS Executive South West
Strat/para. 2.6.10./599/2596	Bovis Homes Ltd South West Region
Strat/para. 2.6.10./415/3509	Redrow Homes (SW) Limited
Strat/para. 2.6.10./558/3813	Robert Hitchins Limited
Strat/para. 2.6.11./577/2495	NHS Executive South West

Summary of Objections

- (a) Not all of Stonehouse is constrained from development by the Cotswolds AONB.
- (b) The strategy should make allowance for redevelopment of brownfield sites that may become available outside existing settlements, including sites within the AONB.
- (c) Sites practically available for development within the AONB must be considered on the balance of their merits. The site at Wades Farm in the AONB will satisfy sustainable criteria that outweigh the effect on the AONB.
- (d) Object to focus of development in the Central Severn Vale. This misinterprets the Structure Plan.
- (e) No case is made to support development south of Gloucester which is either of "first priority" or "sustainable".

Inspector's Reasoning and Conclusions

2.8.1 The references to Stonehouse are overtaken by my recommendations contained in section 1 above, and should satisfy these objections at strategy level. There remain site specific matters which are dealt with elsewhere in my report.

2.8.2 Previously developed land coming forward may not be in appropriate locations, and policies should not be construed as indicating the all such land will be suitable for redevelopment.

2.8.3 The balance which must be weighed in relation to the practical achievement of development is a site specific, rather than strategic matter. Site specific matters are dealt with elsewhere in this report.

2.8.4 I have dealt with the strategy in relation to development within the Central Severn Vale and, in particular, south of Gloucester in section 1 above.

RECOMMENDATION 2.8

Make no modification to the Plan in response to these objections.

2.9 PARAGRAPH 2.6.15 and 2.6.16

The Objections

Strat/para. 2.6.15./228/0531	Stroud Town Council
Strat/para. 2.6.15./577/2497	NHS Executive South West
Strat/para. 2.6.16./499/2073	The Company of the Proprietors of the Stroudwater

Summary of Objections

- (a) There is no firm evidence to show that increase in a towns catchment population will lead to an increase in the use of town centre facilities unless that population is within 5-10 minutes walking distance of the centre.
- (b) Redevelopment of previously used sites in locations within reasonable travel distance of towns can also make a valuable contribution to catchment population of those towns and help secure regeneration.
- (c) Acknowledge that the restoration of the Stroudwater Canal will greatly assist the regeneration of Stroud.

Inspector's Reasoning and Conclusions

2.9.1 All three points raise matters which I consider are too detailed for the Strategy Chapter – see sub-section 1b above. The Council has addressed the Stroudwater Canal point in changes to the Town Centres and Retailing chapter.

RECOMMENDATION 2.9

Make no modification to the Plan in response to these objections.

2.10 PARAGRAPH 2.6.18

The Objections

Strat/para. 2.6.18./410/1429	CPRE - Berkeley Vale
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Summary of Objections

- (a) Agreed contributions to infrastructure should be a condition of granting planning permission with financial penalties if not provided within in a reasonable time.

Inspector's Reasoning and Conclusions

2.10.1 Agreed contributions must be dealt with by legal agreement, rather than a condition. This is too detailed a matter to be dealt with in the strategy: requirements to be sought by way of

a legal agreement are dealt with elsewhere in the Plan.

RECOMMENDATION 2.10

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

2.11 PARAGRAPH 2.6.19

The Objections

Strat/para. 2.6.19./409/1384 Buchanan Partnership

Summary of Objections

- (a) The concept of high quality design is not defined. The Plan refers to the Residential Design Guide, published as supplementary planning guidance, but there are problems with the arguments in this SPG.

Inspector's Reasoning and Conclusions

2.11.1 The Objector seeks the removal of reference to “high quality of design”. This is part of the text which I consider to be too detailed, and my recommendations in section 2.1 of this chapter result in its removal.

RECOMMENDATION 2.11

Make no further modification to the Plan in response to this objection.