

CABINET

30 September 2010

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Report Title	CORE STRATEGY – FUTURE DIRECTION
Purpose of Report	To consider the impact of Coalition Government announcements on the future direction and timetable for the preparation of the Council's Core Strategy.
Decision(s)	<p>Cabinet RESOLVES:</p> <ul style="list-style-type: none"> a) To agree the next steps as set out in the concluding section of the report. b) To agree to continue to use the RSS housing requirement of 9,100 dwellings for Stroud pending the outcome of joint work between Gloucestershire Local Planning Authorities. c) To support officer and member discussions with Gloucestershire Local Planning Authorities to agree the future housing requirement and its distribution in the county to include the possibility of an extension to the mixed use development of Hunts Grove (Hardwicke/Haresfield) to include about 750 dwellings or the redistribution of these dwellings at the Cheltenham-Gloucester SSCT (Strategically Significant Cities and Towns). d) That future work on the Core Strategy should be directed towards focussing development at one or more of the locations in Alternative Strategies A, B and D whilst developing the localism agenda and building in an element of organic growth that accommodates affordable housing and jobs at the more sustainable of our smaller settlements.
Consultation and Feedback	<p>The production of the Core Strategy is subject to legislative requirements for public engagement and involvement. To date there have been two major consultation exercises at the 'Issues' stage and the 'Alternative Strategies' stage.</p> <p>A paper was presented to and discussed at PSAP considering the 'post RSS revocation' position. Members were posed questions via their party groups concerning the future direction of forward planning policy.</p>
Financial Implications and Risk Assessment	The costs to the Council of having to re consult or re start its LDF process in respect of consultation or evidence gathering are considerable. Since commencement of the Core Strategy an estimated £150,000 (excluding staff time) has been spent on evidence gathering for this process. Unless

	<p>the current evidence base can be used whilst it remains relevant, it is likely that such a level of expenditure would need to be incurred again. Without the early confirmation and approval of a Core Strategy the costs of any appeals led approach may also be significant. For example the barristers costs alone on the Aston Down applications was over £70k. There have been several smaller appeals where costs were more modest but still resulted in significant amounts. For instance, the appeal at “land off Church End, Eastington” – New Rugby Club - was in excess of £10k.</p> <p>Des Knight, Interim Finance Manager Tel: 01453 754344 Email: des.knight@stroud.gov.uk</p> <p>A risk assessment has been undertaken of the delivery of the Core Strategy in line with the timetable set out in the Local Development Scheme using the Corporate Risk scorecard. The risk has been scored at 12 giving a high risk factor. It is important therefore that progress is maintained on this important area of work. The evidence base used for the preparation of the RSS is still relevant and cannot be ignored. It would be unwise to reduce housing numbers in an arbitrary manner and the early resolution of this issue would assist the delivery of the Core Strategy.</p> <p>Phil Skill, Head of Planning Tel: 01453 754345 Email: phil.skill@stroud.gov.uk</p>
<p>Legal Implications</p>	<p>Section 15 of the Planning and Compulsory Purchase Act 2004 provides that the local planning authority must prepare and maintain a scheme to be known as their local development scheme which must specify amongst other things, the development documents which are to be development plan documents, the subject matter and geographical area to which each development plan document is to relate and the timetable for the preparation and revision of the development plan documents. The documents once adopted will form the basis for planning development control purposes.</p> <p>The Proposed abolition of the Regional Spatial Strategy (RSS) will affect the emerging Core Strategy.</p> <p>Advice on the preparation and formulation of Core Strategies is contained in PPS12 – This advises that consultation during the preparation of a plan should be proportionate to the scale of issues involved in the plan. Furthermore the vision within the Core Strategy should be in general conformity with the RSS. The intention to abolish the RSS will have undermined the preparation of the Core Strategy in so far as they set targets for future housing development.</p> <p>Furthermore, “a promoting authority should be receptive in preparing its strategy to matters which may have changed since the evidence was collected” (para 4.37, PPS 12).</p>

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Options	Announcements by the new Government since May have altered the planning landscape and now decisions are needed by the Council in respect of the time period it wishes to plan for, the number of houses it wishes to see delivered in the future and how this is balanced with economic development. Delay in collating and analysing responses to the 'Alternative Strategies' consultation has been overshadowed by the strategic policy vacuum that has resulted from the various Government announcements affecting the forward planning system. This paper presents a summary of the position and outlines options and a way forward to address the local issues in the Core Strategy. Decisions on the way forward are required as otherwise planning decisions in the District are likely to become based on increasingly out of date policy contained in the saved policies of the Stroud District Local Plan and the Gloucestershire Structure Plan. In turn, these may be subject to Appeal decisions determined centrally by Planning Inspectors rather than local decision takers.
Performance Management Follow Up	Performance Management will be achieved through the mandatory Annual Monitoring Report (AMR) as part of the <i>Local Development Framework</i> process. The AMR will assess the implementation of the Local Development Scheme and the extent to which policies in the <i>Core Strategy</i> are successfully implemented. The last AMR was submitted to the Secretary of State in December 2009.
Background Papers/ Appendices	Appendix A Table illustrating the net housing completions and commitments at 1 April 2010 set against various housing "requirements" methodologies for Stroud District.

BACKGROUND:

1. This report sets out a summary of current progress on the Core Strategy and the implications for our Core Strategy of recent coalition Government announcements and policy changes. It outlines why it is considered appropriate to revise the timetable for delivery Core Strategy. However it recognises the need to develop at the earliest opportunity a spatial strategy which most closely matches growth with capacity and also meets the aspirations and needs of our local communities.
2. The Core Strategy is the single most important Development Plan Document (DPD) within our Local Development Framework. It will set out broadly where, how, and when, growth within Stroud District will be accommodated over the period to 2026. It will provide a clear plan led approach and a vision for Stroud and its communities on future investment, housing and economic growth and the provision of associated

necessary infrastructure. It will set the local policy framework for how we intend to meet our local needs and objectives such as adapting to and mitigating climate change, the regeneration of our towns, provision of jobs, and meeting affordable housing needs. It will also show how we intend to deliver objectives as set out in other strategy documents such as the Sustainable Community Strategy, Corporate Delivery Plan and the rolling Local Investment Plan.

3. Work on our Core Strategy has been developed to date to align with the requirements of the Regional Spatial Strategy for the South West (SWRSS) as compliance with this has been one of the tests of soundness for the adoption of a Core Strategy.
4. However the new coalition Government has signalled its' intent to return decision making on housing and planning to local communities with particular reference to the forthcoming "Decentralisation and Localism Bill" anticipated in this session of Parliament. In line with this on 6 July 2010 the Secretary of State for CLG announced the revocation of Regional Spatial Strategies and provided some 'questions and answer' advice on immediate issues that may arise from this announcement. It was stated that it will be important for local planning authorities to carry on delivering local development frameworks and making decisions on applications and the advice focuses on how to continue taking these forward. In addition a number of other policy changes have been announced or implemented as indicated later in this report.

Current Progress on Core Strategy

5. Evidence gathering to identify key issues for consideration in the Core Strategy began in 2008 and the Council consulted on its Core Strategy Issues from 13 March to 1 May 2009. Building on this work, a number of spatial options were drafted to address the lead issues arising from the evidence and the consultation responses.
6. Seven potential strategy approaches were identified and formed the basis of an Alternative Strategies consultation document. A set of background Topic Papers was prepared to support this and another public consultation exercise was undertaken from 8 February – 22 March 2010. This period was extended for a small number of Parish Council's to allow them time to discuss the consultation documents at pre-set Parish meetings and submit comments following those meetings.
7. Public exhibitions formed part of the consultation exercise. These attracted over 450 people and between them they left 420 comments about the pros and cons of the seven alternative strategies, whilst 294 people voted on which of the seven were their most favoured strategies. The evidence from these responses indicates that the most favoured options are:
 - Strategy Option A (a single concentration of 2000 homes and supporting infrastructure and employment premises in one place);
 - Strategy Option D (the Stroud Valleys strategy of scattering the 2000 across a number of sites, with some degree of focus on the canal corridor); and
 - Strategy Option B (splitting the 2000 homes, supporting infrastructure and employment premises across two locations)
8. In addition to the comment received via the exhibitions, around 730 organisations and individuals have made formal representations. Whilst the use of the online questionnaire for responses was encouraged, over 400 responses

were received by letter, email or on paper forms. In order to provide consistent analysis of the representations received, it has been necessary for this data to be input by officers into the online database. The 730 representations translate into over 12,500 individual comments as entered into the database to date. It is estimated a further 2,000 are left to enter at the time of writing. This data input task has led to a delay in analysis of the consultation response as it is very labour intensive and has required the use of staff resources from outside of the Planning Strategy team. Further analysis of comments is required to understand the weight to be attached to the points they raise.

Government policy changes

9. Revocation of RSS

The Secretary of State made a formal Parliamentary Statement on the 6 July in which he formally revoked all of the Regional Strategies (currently comprising the Regional Spatial Strategy and Regional Economic Strategy for each Region) with immediate effect. Thus, while technically the development plan is still comprised of the Regional Strategy, saved Local Plans and Structure Plans and Local Development Documents there are now no Regional Strategies to which regard must be had in decision making. The statement was accompanied by a letter from the Chief Planner to all local authorities providing guidance following the revocation.

10. Incentives for housing

The 6 July Statement also confirmed the introduction of “powerful incentives” to encourage the provision of new housing following the revocation of the Regional Strategies. Whilst the detailed mechanisms for these incentives are not yet known, the ‘**New Homes Bonus**’ is expected to match the Council Tax receipts from new homes for 6 years once built. At Band D in Stroud this equates to a ‘bonus’ of £9,028. In his Statement the Secretary of State said “I can confirm that this will ensure that those local authorities which take action now to consent and support the construction of new homes will receive direct and substantial benefit from their actionswe aim to [introduce the incentives] early in the spending review period” [that is, in the period commencing 1 April 2011].

11. Economic growth

The Government has announced it will support the creation of **Local Enterprise Partnerships** – joint local authority-business bodies to promote local economic development – to replace Regional Development Agencies (RDAs). Local Enterprise Partnerships will tackle issues including planning and housing, local transport and infrastructure, employment, enterprise and supporting business start-ups. Other roles currently carried out by the RDAs will be led nationally, such as inward investment, sector leadership, business support, innovation and access to finance.

The Government also proposes to create a Regional Growth Fund in 2011-12 and 2012-13. This Fund will operate in England only and support increases in business employment and growth.

The Government’s 2010 Budget Document stated that a White Paper later in the Summer, amongst other things would, ‘*consider the most appropriate framework of incentives for local authorities to support growth, including exploring options for business rate and council tax incentives, which would allow local authorities to reinvest the benefits of growth into local communities.*’

Similarly, the 'Strategy for Sustainable Growth' (July 2010) published by the Dept for Business Innovation and Skills also states that a White Paper on sub-national growth will ... *'also set out the Government's approach to improving incentives for local economic development, increasing the ability of the planning system to support investment and growth' ... and ... 'The Government's Localism Bill will incorporate economic growth objectives and deregulation into the planning regime.'*

12. Community right to build

On 23 July 2010 Housing Minister Grant Shapps announced his vision for protecting the future of rural village life by giving local communities the power to build the homes they need. He outlined a new right that will allow communities across England to come together and create new homes, shops, businesses and facilities. A new Community Right to Build will shift power from Government to communities. This proposal will be contained in the Decentralisation and Localism Bill. It is proposed that community organisations will have the freedom to give the green light to new local developments without a specific application for planning permission, as long as there is overwhelming community backing in a local referendum. However, the Community Right to Build won't be used to expand the size of communities by more than 10 per cent over a 10 year period.

13. "Back garden" development and housing density

On 9 June 2010 a revised PPS3 was published implementing changes in planning policy relating to so-called "garden grabbing" and housing density advice. . The changes are not a ban on back garden development, but a reclassification of residential gardens which are now excluded from the definition of previously developed land. Alongside this, the minimum density guidelines in PPS3 of 30 dwellings per hectare were abolished. In a letter from the Department for Communities and Local Government (CLG) on 15th June, CLG stated that *"...these changes emphasise that it is for local authorities and communities to take the decisions that are best for them, and decide for themselves the best locations and types of development in their areas..."*

14. Obligation to co-operate

Decentralisation Minister, Greg Clark has confirmed the Government's intention to proceed with the proposal in the Conservatives' pre-election policy green papers that Local Authorities should be subject to a duty to co-operate with each other where planning issues and economic and other requirements are cross-boundary in nature. This again is expected to be a component of the forthcoming Decentralisation and Localism Bill and may help ensure that whilst there is a move to local decision taking, more strategic matters are considered appropriately.

15. Decentralisation and Localism Bill

The Government announced in the Queen's Speech in late May that it would introduce a Decentralisation and Localism Bill in the current session of parliament. The Bill will be a major piece of legislation, introducing not only the changes needed to formally abolish Regional Strategies and to establish the new locally-based planning system, but a wide range of other measures for devolving power to Local Authorities and communities. These are likely to include many proposals from the Conservative Party's *"Control Shift"* policy green paper published in February 2009.

Ministers have indicated that the draft Bill will not be presented to parliament until the autumn, possibly not until close to the end of the year. The current session of

parliament runs until summer 2011. That would still leave sufficient time for the Bill to receive Royal Assent and be enacted before the end of July 2011. However, many of the provisions within the Act will require further regulation and it may take considerably longer for a new development plan system to be finally in place.

DISCUSSION:

16. The abolition of the RSS raises a number of issues. It may well be considered by many to enable Stroud to produce a Core Strategy that more closely aligns to the wishes of its communities. However, there remains uncertainty as to the implications of this action as no alternative system has been put in place for dealing with strategic or cross-boundary issues (e.g. distribution of housing and employment opportunities). The SWRSS has been abolished in its entirety. This means that not only housing targets have gone but so too have the complete suite of both overarching policies in the document and the sub-regional policies (e.g. dealing with development in the Cheltenham - Gloucester Housing Market Area). Local Development Frameworks were to be aligned with the timescale of RSS's but it is now open to the Council to plan for a different period than to 2026 if it considers it appropriate.
17. With regard to housing targets for the District, the responsibility for setting appropriate targets now rests with the Council. However, this cannot be done in isolation from neighbouring Councils. The RSS provided a strategic approach to housing and employment distribution that recognised the principle of higher levels of sustainability at larger urban areas and settlements over that at relatively small towns and villages. Whilst some of the actual locations selected in the RSS for growth were contested, the basic principle remained unchallenged. Therefore whilst economic and housing projections demonstrate trend growth in Districts, the desired distribution of that growth was focussed towards the most sustainable locations – i.e. what were termed Strategically Significant Towns and Cities (Gloucester and Cheltenham in this area).
18. The coalition Government has not made any changes in national planning guidance or legislation that alter that focus for development. The process has been altered only in that top down targets and policies from the RSS are no longer relevant, but it is now up to individual Local Planning Authorities to determine appropriate levels of growth for their administrative areas. Therefore, to maintain the focus on sustainable communities it will be helpful for the Council to agree with neighbouring authorities about a distribution of development. Currently there is no specific mechanism for addressing this issue. Whilst Councils will ultimately need to make their own decisions, it would be advantageous to establish arrangements for agreeing the distribution of development amongst the Gloucestershire Districts. In the meantime, technical work on updating and analysing the influencing factors on trend projections of population, households and housing need will progress through joint working between the Gloucestershire LPA's with a view to reporting back in December.
19. The revocation of the SWRSS has led to a policy vacuum and the prospect that our plans now need to consider whether to incorporate a greater number of policies than was originally envisaged for the Core Strategy. Our Core Strategy consultations to date have specifically excluded consideration of key policy areas covered by existing national and regional policy. To respond to the new situation and the Government's drive towards 'localism', enabling communities to play a bigger role in shaping the future of their area, it is considered necessary to allow for additional consultation mechanisms. This will lengthen

our timescales and may require new thinking about the structure and content of the Core Strategy.

20. In March 2009 we received approval for our revised Local Development Scheme which sets out our programme for the delivery of development plan documents to a timetable and a level of resources agreed by Council. Now, we need to carefully assess the impact of these announcements on this programme and the risks this might bring. It is recognised nationally that the Government announcements have created uncertainty and introduced further delay into the delivery of Core Strategies around the country. We are no exception to this.
21. It is considered critical to the future sustainable growth of the District, and the benefits this can bring to meeting local visions, objectives and needs, that there should be an agreed clear plan led approach to growth. Without such there is a danger that growth will occur in an ad hoc, unplanned fashion, including possibly through the appeals process. In addition the planned provision of necessary strategic infrastructure and the attainment of wider objectives such as those set out in our Sustainable Community Strategy, would be made even more difficult. Lack of this plan led approach would also be likely to incur very significant and potentially unnecessary costs for the Council in determining applications, contesting major strategic appeals and in dealing with and defending costs applications. The Government in the Coalition Agreement announced its intention to create a presumption in favour of sustainable development in the planning system. This would be a material consideration in planning appeals.
22. It is to be hoped that any further announcements from Government regarding transitional arrangements are clear and seek to minimise the risk of judicial review processes. In this way it can help ensure that all the work on consultation and gathering evidence carried out in preparing for our Core Strategy, can continue to be used in an effective and efficient manner. It is considered essential that we respond to these new and emerging arrangements in a way which maximises the Council's strength of position. We should maintain momentum on providing the planning policy framework for Stroud to provide clarity and minimise the risks and costs otherwise likely to be associated with a developer led approach.

Options

There are three clear options:

- Option 1** to continue with the production of the Core Strategy in line with the Proposed Changes to the South West Regional Spatial Strategy.
- Option 2** to agree a deferral of the Core Strategy preparation process in order to await guidance and legislation from Government – notably the Decentralisation and Localism Bill.
- Option 3** to respond to the changes proposed by Government and assess what level of growth is acceptable, taking into account views of local communities, developers and infrastructure providers with a view to developing a Core Strategy which best aligns environmental capacity with acceptable growth.

Option 1

Our LDF work to date has assessed and consulted upon the requirements for Stroud as set out in the SWRSS. The recent abolition of Regional Spatial Strategies by the coalition Government means that it is no longer necessary to comply with the policies of the SWRSS. However, except where more up to date or more detailed local evidence can be produced, the evidence base behind the SWRSS remains valid and should not be ignored. Since the July 2008 publication of the Proposed Changes to the SWRSS there has been new evidence produced that may impact upon those policies contained therein. Nationally there are new population and household projections and emerging economic data in the light of the economic recession that was not part of the SWRSS thinking. Locally, newer evidence exists in the reports on the Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment, Housing Needs Assessment, Stroud Town Centres and Retailing Study, Gloucestershire Local Projections 2010 (household and population), monitoring data on housing and employment delivery, etc. Therefore, it is considered that to simply continue to produce a Core Strategy in line with the Proposed Changes of the SWRSS is inappropriate. This is particularly so in the light of the Council's expressed concerns on the SWRSS that it does not adequately address infrastructure provision or climate change and our opposition to Area of Search 3B at Whaddon.

Option 2

To progress work on the Core Strategy it would be helpful for the proposed new legislation to be in place and to receive clear and early guidance from Government. This should allow sufficient time to assess the legal and financial implications of that guidance prior to publication of the Core Strategy. This would need to be done quickly if we are to seek to minimise unnecessary costs of having to revisit existing evidence as it becomes outdated, and to ensure that we avoid the difficulties set out in the report relating to a vacuum in policy guidance and the prospect of not having a plan led approach in place.

However, the clearest indication of forthcoming guidance and legislation lies in the Government's programme for the introduction of the Decentralisation and Localism Bill and its passage through Parliament. The introduction of this is expected in late 2010 with the earliest likely assent being in July 2011. By that time the existing policies of the Stroud District Local Plan and the Gloucestershire Structure Plan (the two remaining elements of the statutory Development Plan) will have run their course. This will heighten the risk of 'planning by appeal' with ad hoc decisions led by developer interest and taken by Planning Inspectors. Therefore it is proposed that Option 2 is not appropriate as this would introduce too much delay into the process with the inherent risks referred to.

Option 3

In the absence of the SWRSS, the Council will need to show that it has carried out robust assessments of employment, housing and community needs, along with necessary evidence studies to support the distribution of development to meet those needs. Evidence collected to date, including from widespread consultation, has provided much of this. However, we still need to assess the emerging work from the Strategic Infrastructure Delivery Plan (SIDP), consider the carbon footprint impacts of alternative strategies, align the Core Strategy with the emerging Local Transport Plan 3 and, depending upon locations preferred for growth, undertake a Level 2 strategic flood risk assessment.

Assessment of this evidence together with that produced since the publication of the RSS Proposed Changes (referred to in Option 1) is necessary to produce a plan that is sound and evidence based as required by the extant legislation and regulations. Some of this further evidence requirement has emerged from the latest consultation exercise but the need to reassess development requirements is a direct result of the abolition of the SWRSS and the housing targets in particular. The increased emphasis on localism and the potential impacts of the 'New Homes Bonus' also need to be assessed. In the light of this, it is recommended that the programme for the production of the Core Strategy be revisited and a revised LDS be produced that allows the necessary time and resources to be given to these tasks. At the same time work will continue on these tasks and further progress reports will be brought to Cabinet.

Towards a Preferred Strategy

Housing Numbers

23. The table at Appendix A sets out a variety of housing land supply scenarios. It indicates the residual housing requirement when completions and commitments are set out against a variety of housing requirement methodologies. These methodologies are not exhaustive. Further research being undertaken between the LPA's in Gloucestershire and consultation with other stakeholders may provide alternative methods. However, the table is intended to help Members establish an interim position pending the outcome of further research and consultation.
24. The coalition Government has repeated statements that housing delivery remains a high priority and it intends to surpass that of the previous government. Whilst the Secretary of State has suggested that LPA's may base revised housing targets on the level of provision submitted to the original Regional Spatial Strategy examination (Option 1 targets) they will need to be able to defend them if challenged. Those figures for Stroud were compiled in 2005 and would now need to be supplemented by more recent information. Therefore rather than see the revocation of the RSS and abolition of housing targets as an opportunity to reduce housing targets in the District, the Council must consider the most up to date evidence about housing demand and needs and establish for itself a reasonable target whilst bearing in mind the capacity of the District to absorb further growth.
25. The table at Appendix A demonstrates that the latest housing demand projections available for the District generally exceed the targets set for the District in the RSS. However, the RSS took into account the ability of the District to accommodate new housing and the need to distribute it to the most sustainable locations. It is suggested that we should continue to use the RSS figures. That will mean we work to a base figure of 9,100 dwellings up to 2026. However, it is our view that the RSS areas of search south of Gloucester at Hunts Grove extension (250 dwellings) and at Whaddon (1,500 dwellings) remain unproven as elements of the RSS Proposed Changes. Indeed, prior to revocation of the RSS, the Government Office for the South West (GOSW) had commissioned further work to consider whether there are "reasonable alternatives" to the Areas of Search identified in the RSS. In the light of this, we will need to consider whether these numbers are wholly or partly retained in the District; if so, where; if not, will they be absorbed by other Districts?
26. By continuing to utilise the RSS figures we maintain that we can still demonstrate a 5 year housing land supply as set out in PPS3.

South of Gloucester?

27. The Council has long argued that the scale, nature and function of the District's existing settlements together with the exceptional quality of the environment in the District mean that it is not suitable for strategic (i.e. large scale) levels of growth. This has been the thrust of arguments put forward successfully in the past at Public Inquiries into the Structure Plan, Local Plan and Regional Spatial Strategy. Resulting from the latest of these, (2008 RSS Examination in Public), and despite predicted housing demand of 10,301 dwellings (DCLG 2003 based demand) for the plan period, the actual allocation to Stroud was for 9,100 dwellings. This acknowledged the limited capacity of the Stroud District to absorb further growth due to its environmental constraints, the local service centre function of the Stroud/Stonehouse settlements, the need for employment led regeneration, the concerns of greater motorway (M5) commuting and the lack of support for wider distribution to smaller towns. Locations within and north of the SSCT's of Cheltenham and Gloucester were seen as the most sustainable locations for the largest scale of growth.
28. Of the 9,100 dwellings allocated to Stroud in the RSS it was proposed that 3,500 dwellings should be accommodated south of the Gloucester SSCT in the Hardwicke/Haresfield and Brookthorpe-with-Whaddon parishes. Of these, 1,750 dwellings have been granted outline planning permission at the Hunts Grove development. Of the remainder, a further 250 dwellings were anticipated to be provided at Hunts Grove and 1,500 dwellings in the Whaddon area. However, the Whaddon element has been opposed by both Gloucester City and Gloucestershire County Councils in addition to us. If this opposition is to continue and it is accepted that housing demand will not decrease, then there is a need to accommodate this scale of development elsewhere. The allocation was made south of Gloucester in Stroud District to address the requirement to locate development in the most sustainable places and to recognise the economic and other potential of the Gloucester SSCT to add to general regional prosperity and address local regeneration. However, it is recommended that some of the growth should be accommodated elsewhere in the District but that a significant element should remain located at the Gloucester SSCT. This could be accommodated either by reallocation to other parts of the SSCT in Gloucester or Tewksbury and / or extending the Hunts Grove development to take a further 750 – 1,000 dwellings. This will require co-operation between us and Gloucester City Council and possibly others.

Rest of the District

29. Throughout the Core Strategy preparation process it has been suggested that the District has the capacity to allocate land for about 2,000 dwellings in the 'rest of the District' without creating unacceptable environmental harm. If allocated in appropriate locations together with employment growth designed to provide 2 jobs for each new home built, this will help to increase the self-containment of our settlements in a sustainable manner and to provide new homes for the growing population of the District.
30. The alternative Strategies consultation carried out in Feb/March looked at 7 different ways in which to accommodate new development and sought views from the general public. As mentioned in paragraph 7 the early indications are that there is a preference towards concentration of development at one or more of Cam, Eastington, west of Stonehouse, Brimscombe and Thrupp, Whitminster or Stroud Valleys (with a degree of focus on canal corridor regeneration). A

preference for brownfield developments over greenfield was also evident. Many people recognise that whilst greater dispersal of development may be possible, it cannot be accompanied with necessary infrastructure as it does not create the critical mass necessary for the funding to meet community aspirations associated with housing. Dispersal does not make effective use of existing economic infrastructure and drivers. Whilst small developments (say up to 50 dwellings) in smaller towns and larger villages may provide some limited support to ailing rural services, it is unlikely to lead to significant changes in service provision. Growth at villages would increase use of the car to access a wide range of jobs and services as public transport improvements remain largely unviable when associated with small developments. Where rural housing was supported in the responses, it was always the need for small scale, high quality affordable housing schemes that was requested.

31. The preference for concentration of development and focus on brownfield opportunities accords with the thrust of extant national planning guidance. Whilst the task of analysis of the 730 responses (paragraph 8) remains, it is thought unlikely that this will reveal greatly different results to that gained from responses received from the roadshow exhibitions and talks.
32. It is therefore recommended that the future work on the Core Strategy should be directed towards developing a preferred strategy that focuses development at one or more of the aforementioned (paragraph 30) locations (possibly in a hybrid of the preferences), whilst developing the localism agenda and building in an element of organic growth that accommodates affordable housing and jobs at the more sustainable of our smaller settlements. In undertaking this work we will need to consider how we get genuine public ownership of plans for development and how this is related to the Government plans for incentives for house building and economic growth.

The Economy

A major challenge for the District is to address the issue of its' changing economy which has seen the gradual decline of the manufacturing and engineering sectors at a faster rate than growth in the service sector. As a result there is a relative lack of jobs in the District when compared with the number of people living in the District that are available for work. In addition, the jobs available in the District do not readily match the skills of the resident workforce. This has contributed to a high level of commuting in the District with a net outflow of people to work at places such as Gloucester, Cheltenham, Swindon, Bristol and Bath.

Alongside the growth in out-commuting there has been a steady decline in the condition of much of the industrial and commercial building stock. Much of this is dated and not best suited to the demands of modern businesses. As a result industrial and commercial areas and premises that once employed significant numbers of people have become run down and under-used. If this process is not arrested there will be a decline into vacant and derelict sites and premises leading to the further erosion of local job opportunities and a detrimental impact on the local economy.

Therefore it is important for the District to attract new investment into such areas. A number of existing employment sites, especially within the valley bottoms of Stroud, have the potential for redevelopment with a mix of employment, residential, small shops/cafes/restaurants, tourism/leisure and

community uses. To help address the under-provision of jobs and out-commuting from the District, the principle of seeking the provision of 2 jobs in to match each new dwelling is advocated. The changing employment structure should be recognised and emerging growth sectors such as environmental technology capitalised upon, strengths of the area such as media and arts built upon and the latent capacity of the tourist industry exploited. To do this, we could take opportunities to redevelop the least attractive and most unviable sites with an employment led strategy. That would promote a range of small office and business units and studios/workshops alongside residential development and other small scale higher value uses can help improve the viability of redevelopment proposals.

Next Steps

- Review the LDS and resubmit to the Secretary of State for approval
- Monitor new government initiatives and announcements and report back to Cabinet?
- Discuss and agree the broad distribution of new development to meet sustainability criteria amongst Gloucestershire Local Planning Authorities (LPAs)
- Report back on the analysis of representations to the Alternative Strategies consultation
- Assess in more detail the 'concentrated growth' options referred to in paragraph 7 of this report
- Analyse the carbon footprint of the options referred to in paragraph 7 of this report
- Take into account and integrate where possible the findings of the Strategic Infrastructure Delivery Plan and the Local Transport Plan 3 with the emerging Core Strategy
- Undertake Level 2 Strategic Flood Risk Assessment as necessary
- Agree strategic policy content for Core Strategy in the light of the lack of strategic guidance from the RSS
- Undertake further public engagement work to include the wider public and stakeholders in this process.

The table below illustrates the net housing completions and commitments at 1 April 2010 set against various housing “requirements” methodologies for Stroud District.

	First Detailed Proposals Sept 2005	Draft RSS requirements (1 April 2006 to 31 March 2026)	Proposed Changes RSS Requirements (1 April 2006 to 31 March 2026)**	RSS requirements minus remaining south of Gloucester provision	DCLG Household Projections 2008 (for 2006 – 2026)	Peter Smith report for SHMA	Local Household Projections 2010 (for 2006 – 2026)
Completions (1 April 2006 to 31 March 2009)	1,382	1,382	1,382	1,382	1,382	1,382	1,382
Completions between 01/04/2009 and 31/03/2010	323	323	323	323	323	323	323
Total Completions (A)	1,705	1,705	1,705	1,705	1,705	1,705	1,705
Large site commitments at 01 April 2010 (10+ dwellings)	3,647	3,647	3,647	3,647	3,647	3,647	3,647
Small site commitments at 01 April 2010 (1-9 dwellings)	562	562	562	562	562	562	562
Other firm commitments at 01 April 2010*	65	65	65	65	65	65	65
Total Commitments (B)	4,274	4,274	4,274	4,274	4,274	4,274	4,274
Total Completions and commitments (C=A+B)	5,979	5,979	5,979	5,979	5,979	5,979	5,979
Possible Housing Requirement (D)	7,164	6700	9,100	7,350	11,356	11,700	10,032
Residual Requirement (D-C)	-1,185	-721	-3,121	-1,371	-5,377	-5,721	-4,053

* Sites subject to Section 106 Legal Agreement

**Regional Spatial Strategy incorporating the SoS proposed changes July 2008