



Sustainability Appraisal (SA) of the Stroud District Local Plan



SA Adoption Statement

November 2015

REVISION SCHEDULE

Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Nov 2015	SA Adoption Statement published alongside the adopted version of the Stroud District Local Plan	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

Limitations

AECOM Infrastructure & Environment UK Limited (AECOM) has prepared this Report for the use of Stroud District Council ("the Client") in accordance with the Agreement under which our services were performed. No other warranty, expressed or implied, is made as to the professional advice included in this Report or any other services provided by AECOM.

The conclusions and recommendations contained in this Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by AECOM has not been independently verified by AECOM, unless otherwise stated in the Report.

The methodology adopted and the sources of information used by AECOM in providing its services are outlined in this Report. The work described in this Report was undertaken between 2010 and 2015 and is based on the conditions encountered and the information available during the said period of time. The scope of this Report and the services are accordingly factually limited by these circumstances.

AECOM disclaim any undertaking or obligation to advise any person of any change in any matter affecting the Report, which may come or be brought to AECOM's attention after the date of the Report.

Certain statements made in the Report that are not historical facts may constitute estimates, projections or other forward-looking statements and even though they are based on reasonable assumptions as of the date of the Report, such forward-looking statements by their nature involve risks and uncertainties that could cause actual results to differ materially from the results predicted. AECOM specifically does not guarantee or warrant any estimate or projections contained in this Report.

Copyright

© This Report is the copyright of AECOM Infrastructure & Environment UK Limited.

AECOM Infrastructure & Environment UK Limited
 6-8 Greencoat Place
 London, SW1P 1PL
 Telephone: +44(0)20 7798 5000
 Fax: +44(0)20 7798 5001

TABLE OF CONTENTS

1	INTRODUCTION	1
2	THE PLAN-MAKING / SEA ‘STORY’	2
2.1	Introduction	
2.2	Early plan-making / SA work (2010 - 2012)	
2.3	Further consideration of the spatial strategy (early 2013)	
2.4	Development of ‘Core’ and ‘Delivery’ policies (early 2013)	
2.5	Finalisation of the pre-submission plan (summer 2013)	
2.6	Publication of the Pre-submission Plan and SA Report (late 2013)	
2.7	Revisiting spatial strategy alternatives and site options (2014)	
2.8	Developing proposed modifications (2015)	
2.9	Finalisation of the plan (2015)	
3	MEASURES DECIDED CONCERNING MONITORING	23

1 INTRODUCTION

- 1.1.1 Stroud District Council (SDC) adopted the Stroud District Local Plan on 19 November 2015. Work to develop the plan was undertaken by SDC between 2009 and 2015.
- 1.1.2 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making. AECOM (formally URS) took lead responsibility for the SA process.
- 1.1.3 SA is a mechanism for considering and communicating the likely effects of a draft strategy, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives.
- 1.1.4 It is a requirement that SA involves a series of procedural steps. The final step in the process involves preparing a 'statement' at the time of plan adoption with a view to explaining:
- 1 – The 'story' of plan-making / SA up to the point of adoption
 - There is essentially a need to update the story explained within the SA Report, to reflect plan-making / SA steps undertaken since the SA Report was published.
 - Specifically, the Regulations¹ explain that there is a need to: *“summaris[e] how environmental considerations have been integrated into the plan or programme and how the environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8 and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with.”*
 - In short, there is a need to summarise how sustainability considerations have been taken into account through the plan-making process and influenced plan-making, including as a result of alternatives appraisal and other SA work, and consultation on the draft plan / SA Report.
 - 2 – Measures decided concerning the monitoring of plan implementation.
- 1.1.5 This Adoption Statement considers (1) and (2) in turn.

¹ The information to be provided in the Adoption Statement is listed in Article 9 of the SEA Directive / Regulation 16 of the Regulations.

2 THE PLAN-MAKING / SEA 'STORY'

2.1 Introduction

2.1.1 Essentially, SA must feed-into and inform plan-making in two ways:

- 1 – Appraisal of alternatives informs preparation of the draft plan.
- 2 – The SA Report, and consultation responses received during the draft plan / SA Report consultation, informs plan finalisation.

2.1.2 However, it is typical for the plan-making / SA process to be more iterative than this, and that was the case with the Stroud District Local Plan.

2.1.3 This Chapter gives consideration to each of the main plan-making / SA steps in turn. In line with regulatory requirements (discussed above), there is a focus on explaining how sustainability considerations have been taken into account and influenced plan-making, including as a result of alternatives appraisal and other SA work, and consultation on plan documents alongside SA documents.

2.2 Early plan-making / SA work (2010 - 2012)

2.2.1 The Council has been testing alternative Growth Scenarios since **2010**, when an 'Alternative Strategies for shaping the future of Stroud District' consultation document was published for consultation. An interim SA Report was published alongside, which presented an appraisal of seven alternative strategies, concluding that:²

"In sustainability terms there are both benefits and disbenefits to the approaches of concentrating and dispersing development. The most favourable approach for the District will therefore be determined by [an informed trade-off between competing objectives]. It may be that a combined approach such as Strategy E which has elements of both a concentrating and dispersing approach would be most favourable. Strategy D [a focus on the Stroud Valley] performs strongly against SA Objectives as it brings benefits associated with regeneration."

2.2.2 The alternative broad spatial strategies were also assessed in terms of how they might perform from the point of view of CO₂ emissions / renewable energy generation potential. The three strategies which proposed levels of concentrated growth were found to provide the best opportunity to reduce emissions.³

2.2.3 Subsequent to the consultation, further work was undertaken to understand more about the merits of possible locations for growth. Findings of this work were presented in a 'Pros and Cons of Potential Locations for Strategic Growth' paper in October, **2011**. The document included a 'Pros and Cons comparison', which brought together the emerging results of a number of pieces of work. Three interrelated conclusions emerged from this analysis:

1. A 'hybrid' approach, concentrating development at a few locations and including canal corridor regeneration presented the most sustainable option for meeting development needs spatially across the district.

2. Development should be focussed at four 'preferred' locations:

- Stroud Valleys (various sites) 600 -1,000 homes (and target 1,200-2000 jobs)
- North East of Cam 750 – 1,250 homes (and target 1,500-2,500 jobs)
- West of Stonehouse 1000-1,500 homes (and target 2,000-3,000 jobs)
- Hunts Grove extension 500 – 750 homes

3. The exact distribution of the agreed levels of housing and employment growth (aspiration of two new jobs for every new home built) should be subject to further consultation.

² The Interim SA Report is available at: http://www.stroud.gov.uk/info/plan_strat/Alt_Strat_sustainability_appraisal.pdf

³ The Carbon Footprint Study (Amec, 2011) is available at: http://www.stroud.gov.uk/info/localplan/carbon_footprinting_study.pdf

- 2.2.4 Armed with this ‘bottom-up’ understanding of possible locations for growth - in addition to the ‘top-down’ understanding achieved via consultation-on and appraisal of the seven alternative broad spatial strategies - the Council was able publish a ‘Preferred Strategy’ in **2012** that involved strategic growth at: the Gloucester fringe; west of Stonehouse; around Stroud and along the Stroud Valleys; north of Cam; and in the ‘Berkley Cluster’, specifically at Sharpness.
- 2.2.5 A second Interim SA Report was published alongside that presented a high-level appraisal of the preferred strategy alongside an appraisal of the seven alternative strategies. The preferred strategy was found to perform well, with the appraisal highlighting the benefits associated with striking a balance between concentration and dispersal.
- 2.2.6 In early 2013, further ‘interim’ appraisal was undertaken in order to inform –
- Further consideration of the spatial strategy; and
 - Preparation of ‘Core’ and ‘Delivery’ policies

2.3 Further consideration of the spatial strategy (early 2013)

- 2.3.1 Subsequent to the 2012 consultation new evidence came to light that identified the possibility of the Local Plan needing to deliver a higher growth quantum. As such, the Council set about giving further consideration to site options and alternative scenarios. The alternatives that were the focus of appraisal in early 2013 are presented in Table 2.1.

Table 2.1: Alternative Growth Scenarios appraised in early 2013

	9,500 dwellings to 2031			11,500 dwellings to 2031	
	West of S’house only	No west of Stonehouse	Development at all locations	Development at all locations	West of S’house only
Residual requirement ⁴	2400	2400	2400	4400	4400
Hunts Grove extension	-	500	500	750	-
North East Cam	-	500	500	750	-
Sharpness	-	250	250	250	-
Stroud Valleys	-	300	300	300	-
West of Stonehouse	1550	-	750	1500	3550
Council house programme	100	100	100	100	100
Windfall	750	750	-	750	750
TOTAL	2400	2400	2400	4400	4400

⁴Residual requirement equals the number of homes that must be delivered in the plan period minus the number of homes that are already committed, e.g. have planning permission. The residual requirement minus the number of homes that it is assumed will come forward as windfall sites minus the number of homes that will be delivered through the Council house programme equals the number of homes for which land must be allocated by the plan.

2.3.2 Summary appraisal findings were as follows:

- Option 1 - is a lower growth option that would involve concentrating development at West of Stonehouse. For this reason it performs well in terms of biodiversity issues/objectives. It is suggested that Option 1 also performs well – equally well as Option 5 – in terms of climate change mitigation given the potential to design-in high quality low carbon infrastructure in the form of a district heating network. Option 1 performs poorly in terms of socio-economic considerations given that ‘overconcentration’ would result in missed opportunities locally for housing growth to meet locally arising housing needs, support economic growth / regeneration and enhance access to community services and facilities. Option 1 also performs poorly in terms of ‘soil’ (along with Options 4 and 5) given that housing growth would be delivered on greenfield land / no growth would be focused at brownfield land in the Stroud Valleys.
- Options 2 and 3 – are somewhat ‘middle-ground’ options, i.e. options that avoid the need to ‘trade-off’ between competing sustainability objectives (to an extent).
- Option 4 – performs well in terms of a range of socio-economic objectives on the basis that it is a higher growth option that would result in concentrated development at several locations around the district adjacent to existing settlements therefore ensuring the ‘benefits of growth’ (see discussion under Option 1) are spread across the District.
- Option 5 – performs well in terms of biodiversity and climate change mitigation (see discussion above, under Option 1); however, concentrating development at West of Stonehouse would lead to missed opportunities in terms of socio-economic considerations.

2.3.3 The Council’s response to the alternatives appraisal findings was as follows -

The development strategy proposes housing allocations at the main settlements that exist within and adjoining the District: at Stroud, at Cam and south of Gloucester. A site at Sharpness is proposed, to meet specific regeneration and tourism objectives. This Strategy integrates employment provision with housing opportunities. This is necessary to help ensure that the existing housing/employment imbalance is not exacerbated and to help greater self-containment of communities. With locations easily accessible by a range of transport modes we can help minimise commuting and reduce the carbon footprint of new development. With the co-location of housing and employment, this provides the opportunity for shorter journeys to work by means of transport other than the car. The Cam, Sharpness and Stroud sites can secure higher value residential land uses which in turn can help improve the viability and servicing of the lower value employment land uses in mixed development proposals. In the Stroud Valleys, there are some sites in existing employment use but that are somewhat run down and under-used. These require further investment to realise a greater employment potential. The strategy supports the release of parts of these sites for higher value uses to provide funding for intensified employment provision on the rest of the site. The aim for these mixed use redevelopment sites is to retain existing employment numbers and supplement these on-site. The GFirst LEP Growth Statement (2013) identifies that there are major opportunities for future economic growth along the M5/A38 corridor which is the property market focus for sub-regional industrial and modern office demand. In summary the development strategy therefore identifies that employment growth should be broadly targeted at the south of Gloucester/M5 Corridor/Stroud Valleys strategic locations, that are also identified for housing development. Sustainability Appraisal and other analysis undertaken in 2011/12 showed the preferred approach – essentially one of ‘dispersed concentration’ – to perform well relative to alternative strategies (see discussion above in Section 10). In particular, the preferred approach was shown to perform well in terms of the objective to reduce the carbon footprint of Stroud residents. Further appraisal of alternative spatial strategies undertaken in 2013 (see discussion above) highlighted that there are merits to an approach that involves following a higher growth strategy with the allocation of West of Stonehouse as a strategic location for growth. In light of this (and in-light of the fact that evidence-based understanding of ‘objectively assessed housing need’ may change over time) West of Stonehouse was recommended by officers to be included as a ‘reserve site’ in the draft plan considered by the Council in July 2013.

2.4 Development of ‘Core’ and ‘Delivery’ policies (early 2013)

- 2.4.1 The Council recognised a need to consult on working draft ‘Core’ and ‘Delivery’ policies prior to preparing the pre-submission version of the Plan. This consultation ran from March to May 2013. In order to inform the consultation and subsequent ‘finalisation’ of the policies, the draft policies were appraised and findings were presented in an Interim SA Report published alongside the consultation document.
- 2.4.2 Table 2.2 presents the ‘conclusions’ and ‘recommendations’ of the Interim SA Report under 11 ‘topic’ headings along with the Council’s response / justification for selecting the preferred approach in-light of appraisal findings.

Table 2.2: Findings of the 2013 Interim SA Report, along with Council responses

Recommendations	SDC response
Air and soil quality	
<p>The appraisal concluded that: <i>The policy approach should have the effect of mitigating negative effects of development in terms of air and soil quality. Most likely, given the fact that baseline conditions are currently non-problematic, this will be to the extent that significant negative effects associated with growth (regardless of the level or distribution) can be avoided.</i></p>	
<ul style="list-style-type: none"> • In-line with the NPPF requirement to encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value, ensure that Policy CP14 (<i>High quality sustainable development</i>) gives weight to brownfield development over that occurring on greenfield. 	<p>Agreed. Added a criterion to Core Policy CP14 – <i>High quality development, which protects, conserves and enhances the built and natural environment, will be supported. Development will be supported where it achieves the following:..... 6. Re-use of previously developed land and/or the adaptation of existing buildings that make a positive contribution to the character of the site and surroundings, unless demonstrably unviable.</i></p>
Biodiversity	
<p>The appraisal concluded that: <i>The policy approach should have the effect of mitigating to some extent the negative effects of growth, although such mitigation measures appear unlikely to lead to no net loss in biodiversity without efforts to employ biodiversity offsetting (particularly in a high growth scenario) due to the limitations of onsite enhancement (in terms of the potential to contribute to biodiversity at wider scales) and the cumulative effects of development. The positive effects of the Core and Delivery policies in terms of protection of biodiversity on development sites could meanwhile be improved upon by emphasising the role that enhancements to biodiversity can play in terms of the provision of ‘ecosystem services’, including as part of a planned approach to ‘green infrastructure’).</i></p>	
<ul style="list-style-type: none"> • Strengthen Policy ES6 (<i>Providing for biodiversity and geodiversity</i>) by making provision for biodiversity offsets to ensure no net loss of biodiversity at the District scale 	<p>Agreed but in discussion with ecologists there is a question on appropriateness of and success of off-setting in respect of biodiversity in all cases. Therefore added to penultimate paragraph of Delivery Policy ES6 – <i>The Council may, in exceptional circumstances, allow for biodiversity offsets, to prevent net loss of biodiversity at the District scale.</i></p>

Recommendations	SDC response
<ul style="list-style-type: none"> The approach outlined in Policy CP11 (<i>New employment development</i>) could be strengthened by calling on proposals to result in environmental enhancements, including to biodiversity and green infrastructure 	<p>Agreed. Added a criterion to Core Policy CP11 –</p> <p><i>5. Enable provision of infrastructure in ways consistent with cutting carbon dioxide emissions and adapting to changes in climate (including SuDS and green infrastructure).</i></p>
<ul style="list-style-type: none"> Integrate biodiversity into Policy CP8 (<i>New housing development</i>) by making explicit the need to provide environmental enhancements, including green infrastructure and areas for wildlife 	<p>Agreed. Added a criterion to Core Policy CP8 –</p> <p><i>6. Major residential development proposals will be expected to enhance biodiversity through a network of multi-functional green spaces, which support the natural and ecological processes.</i></p>
<ul style="list-style-type: none"> Include considerations of green infrastructure as an element of good design in Policy ES12 (<i>Better design of places</i>) 	<p>No change to Delivery Policy ES12. Considered issue covered in first paragraph:</p> <p><i>The District Council will require the layout and design of new development to create well designed, socially integrated, high quality successful places, where people enjoy living and working, with legible and well planned routes, blocks and spaces, integrated residential, commercial and community activity, safe attractive public spaces and pedestrian/cycle routes without traffic conflict, secure private areas, better designed buildings and landscaped spaces.</i></p> <p>Green Infrastructure also covered by supporting text in Plan such as at Core Policy 6 Developer Contributions and Infrastructure (Para 2.89). The plan should be read as a whole.</p>
<ul style="list-style-type: none"> Incorporate biodiversity considerations into Policy HC1 (<i>Meeting small-scale housing need within defined settlements</i>) by requiring that small-scale housing within defined settlements does not result in the loss of open space of value for wildlife 	<p>Agreed. Added a criterion to Delivery Policy HC1 –</p> <p><i>5. it would not result in the loss of locally valued habitat which supports wildlife.</i></p>
<ul style="list-style-type: none"> Include considerations of the environmental impacts and opportunities (including biodiversity and green infrastructure) of new sports, leisure and recreation facilities into Policy EI11 (<i>Promoting sport, leisure and recreation</i>) 	<p>Agreed. Added a criterion to Delivery Policy EI11 –</p> <p><i>6. any biodiversity interest is enhanced by taking opportunities to create a network of multi-functional green spaces, which support the locality's natural and ecological processes.</i></p>
<ul style="list-style-type: none"> Ensure that policy gives weight to brownfield development over that occurring on Greenfield by incorporating it in Policy CP14 (<i>High quality sustainable development</i>) and / or a standalone policy. 	<p>Agreed. Added criteria to Core Policy CP14 –</p> <p><i>2. No unacceptable levels of air, noise, water, light or soil pollution or exposure to unacceptable risk from existing or potential sources of pollution. Improvements to soil and water quality will be sought through the remediation of land contamination, the provision of SuDS and the inclusion of measures to help waterbodies to meet good ecological status;</i></p> <p>and</p> <p><i>6. Re-use of previously developed land and/or the adaptation of existing buildings that make a contribution to the character of the site and surroundings, unless demonstrably unviable.</i></p>

Recommendations	SDC response
Climate change mitigation	
<p>The appraisal concluded that:</p> <p><i>The policy approach should ensure that development is designed with minimising carbon emissions in mind. Policy will also ensure seek to ensure good access to public transport, albeit in a District where provision is generally relatively poor. However, it is not possible to conclude that the Plan is on-track to support reduced car dependency without making assumptions about growth quantum / distribution (particularly given that Stroud is a rural District where reducing car dependency is a challenge).</i></p> <p><i>There is some concern raised regarding the potential for policy to result in negative effects as a result of placing constraints on renewable low carbon energy infrastructure.</i></p>	
<ul style="list-style-type: none"> • CP14 (<i>High quality sustainable development</i>) should include the requirement for on-site renewable energy generation. 	<p>Agreed. Modified criterion to Core Policy CP14 –</p> <p><i>1. Sustainable construction techniques, including facilities for the recycling of water and waste, measures to minimise energy use and maximise renewable energy production.</i></p>
<ul style="list-style-type: none"> • CP14 (<i>High quality sustainable development</i>) should be strengthened to ensure development has good transport links to the wider public transport network, not only to nearby services. 	<p>Agreed. Modified criteria to Core Policy CP14 –</p> <p><i>13. Safe, convenient and attractive accesses on foot and by cycle and suitable connections with existing footways, bridleway, cycleways, local facilities and public transport and 14. It is at a location that is near to essential services and good transport links to services by means other than motor car.</i></p>
<ul style="list-style-type: none"> • ES2 (<i>Renewable or low carbon energy generation</i>) should recognise that renewable and low carbon sources can also have positive impacts on users and residents of the local area. 	<p>Agreed. Added supporting text to Delivery Policy ES2 (Para 6.22) –</p> <p><i>Such development can have positive effects upon local communities, as well as natural resource use and building resilience to future climate change. For example, photovoltaic arrays at the Dursley swimming pool and at Cam - Winterbottom Memorial community hall; that all generate an income source for those facilities.</i></p>
<ul style="list-style-type: none"> • It is recommended that Policy ES2 (<i>Renewable or low carbon energy generation</i>) is reworded such that wind turbine proposals should be subject to an “appropriate level of” rather than “rigorous” assessment. 	<p>Agreed. Modified criterion to Delivery Policy ES2 –</p> <p><i>Wind turbine proposals in the vicinity of the designated sites of international importance for nature conservation at the Severn Estuary, will need to be subject to an appropriate level of assessment in respect of potential impacts on biodiversity (including bird or bat species).</i></p>
<ul style="list-style-type: none"> • Policy ES12 (<i>Better design of places</i>) could include reference to the need for new development to also be designed to be resilient to future climate change. 	<p>Part agreed as covered in other areas of the Plan. Modified criterion to Delivery Policy ES12 –</p> <p><i>New development should be designed to offer flexibility for future needs and uses taking into account demographic and other changes.</i></p>
Community and wellbeing	
<p>The appraisal concluded that:</p> <p><i>The policy approach should have the effect of mitigating the negative effects of growth in terms of community & wellbeing, and should to some degree help to ensure that the positive effects of growth are realised / maximised. However, the policies could be strengthened to ensure that those with the most acute housing needs are supported.</i></p>	

Recommendations	SDC response
<ul style="list-style-type: none"> Consider means of increasing the threshold for affordable housing provision set out in policy CP9 (<i>Affordable housing</i>) in order to better meet local requirements for such dwellings 	<p>Agreed, however Core Policy CP9 is however a higher threshold than the existing Plan so no change necessary.</p>
<ul style="list-style-type: none"> Policy ES14 (<i>Provision of semi-natural and natural greenspace with new residential development</i>) should be adjusted to specify the size of natural greenspace accessible within 300m in order to maximise community and wellbeing gains 	<p>Agreed. Modified criterion to Delivery Policy ES14 – <i>No person should live more than 300m (or 5 minutes walk) from their nearest area of natural green space of at least 2 hectares in size.</i></p>
<p>Economy and employment</p>	
<p>The appraisal concluded that: <i>The policy approach gives a strong indication that the Plan - regardless of growth quantum / distribution - will result in significant positive effects in terms of the ‘economy and employment’. The policies should lead to improvements in retail and leisure provision, development that will benefit the tourist industry, and opportunities for small scale development in the countryside.</i></p>	
<ul style="list-style-type: none"> Introduce flexibility over the floorspace threshold requirements for impact assessments in Policy EI9 (<i>Floorspace thresholds for Impact Assessments</i>). To ensure no adverse effects would take place and prevent any ‘threshold abuse’ of development coming forward just below the threshold leading to negative effects. 	<p>Agreed. Modified criterion to Delivery Policy EI9 – <i>Exceptionally a retail impact assessment may be required for smaller units where it is considered that the development either alone or with other development would harm nearby centres.</i></p>
<ul style="list-style-type: none"> Consider whether there may be benefit to focusing tourism development (Policy EI10) within settlement boundaries to ensure that local people in existing settlements can benefit from tourism development. 	<p>Agreed. Modified 1st paragraph to Delivery Policy EI10 to direct development to within settlement development limits – <i>Tourist development, including attractions and tourist accommodation, will be encouraged and supported inside settlement development limits at Accessible Local Service Centres, Local Service Centres and Accessible Settlements with Limited Facilities, subject to a sequential assessment.</i></p>
<ul style="list-style-type: none"> Ensure that Policy EI10 (<i>Provision of new tourism opportunities</i>) specifies no adverse impact on townscape in order to maintain the quality of the built environment for tourists. 	<p>Agreed. Modified criterion to Delivery Policy EI10 – <i>3. the scale, design and use of the proposal is compatible with its wider landscape setting and would not detract from any acknowledged biodiversity interest, character or appearance of the landscape or settlement and would not be detrimental to the amenities of residential areas;</i> And supporting text at paragraph 5.53 – <i>Stroud District’s built and natural environment is a key part of the tourism product and the future success of the area’s tourism industry is, in many ways, dependent on the effective management and conservation of the environment.</i></p>

Recommendations	SDC response
Housing	
The appraisal concluded that: <i>The policy approach should have the effect of mitigating the negative effects and enhancing the positive effects of growth. However, the results of this appraisal indicate that the policy approach could be strengthened.</i>	
<ul style="list-style-type: none"> Consider requiring a higher percentage of units within qualifying developments to be affordable in order to help address shortfalls in affordable housing delivery. 	<p>No change. Considered and already changed from last Local Plan. Core Policy CP9 wording is clear that development will be at least 30% and site area threshold has also been reduced.</p>
Landscape and cultural heritage	
The appraisal concluded that: <i>The policy approach should help to ensure that growth can be accommodated whilst securing and reinforcing local distinctiveness and environmental quality associated with local landscapes and townscapes.</i>	
<ul style="list-style-type: none"> None 	No change recommended. Welcome support. Adequately covered in existing policies.
Transport and accessibility	
The appraisal concluded that: <i>It is unclear whether the policy approach is likely to have any significant impact in terms of promoting traffic reduction and discouraging car ownership/use. Currently, the policies give broadly equal weight to road infrastructure provision compared to other more sustainable transport alternatives.</i>	
<ul style="list-style-type: none"> CP10 should include explicit locational criteria (as per CP8 and CP11) requiring that sites be readily accessible by public transport, bicycle and walking in order to reduce reliance on and number of vehicle movements. 	<p>Agreed. Added criteria to Core Policy CP10 – If the need cannot be met at any existing suitable site the following location criteria will apply:</p> <p><i>A. The proposal will not have a significant detrimental impact on neighbouring residential amenity or other land uses</i></p> <p><i>B. The site has safe and satisfactory vehicular and pedestrian access to the surrounding principal highway network</i></p> <p><i>C. The site is situated in a suitable location in terms of local amenities and services including schools, shops, health services, libraries and other community facilities</i></p> <p><i>D. The site is capable of providing adequate on-site services for water supply, mains electricity, waste disposal and foul and surface water drainage.</i></p> <p><i>E. The site will enable vehicle movements, parking and servicing to take place, having regard to the number of pitches/plots and their requirements as well as enabling access for service and emergency vehicles.</i></p> <p><i>F. The site is not situated within an unacceptable flood risk area.</i></p>
<ul style="list-style-type: none"> ES11 (Maintaining, restoring and regenerating the District’s canals) could identify and support measures to improve access to the canal for its use for transportation 	<p>Agreed. Modified 1st paragraph to Delivery Policy ES11 –</p> <p><i>The Council will encourage the restoration of and other necessary functional improvements to the District’s canals. It will seek to improve access to and along the canals to encourage use for transport and for leisure / recreational purposes.</i></p>

Recommendations	SDC response
Waste	
<p>The appraisal concluded that: <i>The policy approach should have the effect of bringing about increased levels of material efficiency in construction regardless of the level and location of growth pursued. The positive effects of the strategy could however be augmented with a greater focus on encouraging industrial efficiency in business and industry.</i></p>	
<ul style="list-style-type: none"> • Include considerations of industrial symbiosis when deciding upon development applications for new business and industrial premises. 	<p>Agreed. Added criteria to Core Policy CP11 – <i>6. Demonstrate how the principles of industrial symbiosis have been taken into account.</i></p>
Water	
<p>The appraisal concluded that: <i>The policy approach should have the effect of mitigating the negative effects associated with the Development Strategy.</i></p>	
<ul style="list-style-type: none"> • Provide further detail, and highlighting examples of the opportunities of natural flood risk prevention measures as part of SuDS in order to strengthen the application of ES4 (Water resources, quality and flood risk). 	<p>Agreed. Added supporting text to Policy ES4 (Para 6.35) – <i>The favoured approach in Stroud District to dealing with surface water is through Sustainable Drainage Systems (SuDS) as they aim to mimic natural drainage processes and remove pollutants from urban run-off at source. They comprise a wide range of techniques, including:</i></p> <ul style="list-style-type: none"> • Green Roofs • Permeable Paving • Rainwater Harvesting • Swales • Detention Basins • Ponds • Wetlands <p><i>This is not a comprehensive list and applicants should identify the most appropriate scheme, or combination of schemes to suit the proposed development. The multi-functional role of SuDS should be considered in developments. They can provide, alongside flood alleviation measures, green corridors and wildlife habitat creation and therefore could provide holistic solutions for development sites as part of a wider green infrastructure network.</i></p>
<ul style="list-style-type: none"> • Policy ES3 should be strengthened to ensure permission will not be granted to any development that would lead to increased flood risk on or off site, not simply an “unacceptable” level of risk. 	<p>Agreed. Modified criterion to Delivery Policy ES3 – <i>Permission will not be granted to any development which would be likely to lead to, or result in an unacceptable level of: 4. Increased risk of flooding on or off the site, and no inclusion of measures to reduce the causes and impacts of flooding.</i></p>

2.5 Finalisation of the pre-submission plan (summer 2013)

2.5.1 A ‘working draft’ version of the Pre-submission Plan was appraised in July 2013 and a ‘Draft SA Report’ was prepared. The working draft Plan and Draft SA Report were then presented for consideration by Stroud District Council’s Environment Committee on Monday 8th July 2013 and by the Strategy and Resources Committee on Wednesday 10th July 2013. The two committees identified a series of changes to the Plan, which they considered should be made a condition of Council approval. The changes recommended by each Committee were then subject to consideration by Council on 25th July 2013. Council agreed the following:

- 1) To reduce the quantity of housing at **North east of Cam** from 500 to 450 dwellings
- 2) To increase the quantity of housing at **Sharpness Docks** from 250 to 300 dwellings
- 3) To delete any reference to a reserve site at **West of Stonehouse**

2.5.2 The decision to not allocate West of Stonehouse was particularly significant. The decision was taken in-light of appraisal findings presented within the Draft SA Report, which are summarised below.

Table 2.3: Key messages regarding West of Stonehouse as presented within the Draft SA Report (2013) prior to the decision being made to not allocate the site

TOPIC	KEY MESSAGES REGARDING WEST OF STONEHOUSE FROM THE DRAFT SA REPORT
Air	Allocation of West of Stonehouse would result a significant concentration of growth; however, this is unlikely to result in air quality problems locally. It is understood that West of Stonehouse does lend itself to ‘encouraging walking and cycling’ (see discussion under ‘Transport and accessibility’, below).
Biodiversity	<p>The site itself is unconstrained in terms of strategic biodiversity considerations, although it does border an extensive locally important wildlife site (associated with the canal corridor). This is not thought to be a major concern (given that the important habitat is located on the opposite side of the canal).</p> <p>A major development of this scale should lead to the potential to ‘design-in’ green infrastructure, ensuring that the development is ‘permeable’ to species movement and green infrastructure within the development footprint supports the functioning of the district-wide ecological network.</p>
Climate change mitigation	Allocation of West of Stonehouse would result a significant concentration of growth and, as such, there would be good potential to design-in an optimal district heating scheme.
Community and wellbeing	Allocation of West of Stonehouse would result a significant concentration of growth. Development concentrated in this way could result in funding been made available for new services and facilities to the benefit of new and existing residents locally; and, more generally, there would be a good opportunity for self-containment and the building of a cohesive, inclusive community.
Economy and employment	Allocation of West of Stonehouse would support the potential for this area to develop as a major employment hub, with high quality transport infrastructure (including for walking / cycling). There would be a real possibility of residents moving to the area with a view to working locally and hence there would be the potential to attract ‘knowledge industry’ employers and higher skilled residents.

TOPIC	KEY MESSAGES REGARDING WEST OF STONEHOUSE FROM THE DRAFT SA REPORT
Housing	Allocation of West of Stonehouse would result in a greater quantum of housing development within the District, and hence there would be additional development of much needed affordable housing.
Landscape and cultural heritage	Allocation of West of Stonehouse would result a significant concentration of growth; however, it is not possible to conclude that there would be negative implications for landscape or heritage given the relatively unconstrained nature of this location. Land West of Stonehouse is identified (by the recently completed Landscape Sensitivity Analysis study) as having a 'medium-low' landscape. The boundary of the AONB is located 0.5km to the east.
Soil	Allocation would result in additional greenfield development.
Transport and accessibility	<p>There would be the opportunity to realign the employment allocation (Policy SA2) as part of a comprehensive masterplan for the area (with phasing arrangements put in place to ensure that employment land is developed and completed in parallel with housing land completions to ensure a balanced development). There would be considerable opportunity to design in high quality walking, cycling and public transport infrastructure and ensure that new development is well linked to the nearby major employment site and Stroud town centre (including via the canal). It is also recognised that a development of this scale would secure contributions that go some way towards funding the reopening of the Stonehouse (Bristol line) railway station.</p> <p>It is also important to consider access to the strategic road network given the current problem of high levels of 'out-commuting' (i.e. commuting out of the District) for work. West of Stonehouse is particularly 'well' located in relation to the M5. However, it is assumed that any negative effect would not be significant given that targeted employment growth (skilled jobs for which Stroud residents are qualified for) would be provided alongside housing development.</p>
Waste	Allocation of West of Stonehouse would result in this area being the focus of a major concentration of growth; however, there is no reason to suggest that this has implications for waste management.
Water (inc. flood risk)	The site is understood to be unconstrained in terms of strategic considerations.

2.6 Publication of the Pre-submission Plan and SA Report (late 2013)

2.6.1 The preferred approach determined by members was reflected in the 'Pre-submission' version of the plan, which was published (in line with Regulation 19 of the Local Planning Regulations) for six weeks and then subsequently submitted to Government in December 2013, alongside a summary of the representations received. In line with the Regulations, the SA Report was published and submitted alongside the plan.

2.6.2 Table 2.4 presents the preferred spatial strategy, as reflected in the Pre-submission Plan.

Table 2.4: The preferred spatial strategy, as published / submitted

Strategic Sites	
Hunts Grove Extension	500
North East Cam	450
Sharpness	300
Stroud Valleys	300
Non-site specific allowance	
Council housing programme	150
Windfall	750
Total	At least 2,450

2.6.3 The SA Report essentially presented information on alternatives (within 'Part 2', which answered the question: "What has plan-making / SA involved up to this point?") and the draft plan (within 'Part 3', which answered the question: "What are appraisal findings at this current stage?").

2.6.4 The overall conclusion reached on the draft plan was as follows -

"The appraisal has concluded that the plan is likely to lead to significant positive effects in terms of 'economy and employment', 'housing', 'landscape and heritage', 'soil', and 'transport and accessibility' related sustainability objectives. These benefits largely relate to the carefully targeted spatial approach to growth (which can be described as a 'dispersed concentration' approach).

This preferred spatial approach does not lead to any 'glaring' trade-offs (i.e no significant negative effects are identified); however an alternative approach that includes allocation of a major development at West of Stonehouse would likely lead to a better performing plan in terms of socio-economic objectives. It is also noted that the decision taken in July 2013 to reduce the quantum of growth at North east of Cam (500 to 450) and increase the quantum of growth at Sharpness Docks (250 – 300) gives rise to some (more minor) trade-offs between sustainability objectives.

Recommendations at this current stage

- *From a 'housing' perspective... it is recommended that the plan includes West of Stonehouse as a reserve site that would be allocated if evidence comes to light that objectively assessed housing needs will not be met / there will be a housing shortfall. This approach could have the benefit of preventing delay in housing delivery that would result if it is the case that a housing shortfall is addressed through a review of the Local Plan.*

- *From a 'climate change mitigation' perspective... it is recommended that appropriate wording is added to the Strategic Allocation (SA) policies (or, at least, the SA Policies for sites where viability is less likely to be a concern) with a view to encouraging delivery of low carbon energy infrastructure / district heating networks (in-line with the findings of the Stroud Carbon Footprinting Study)."*

2.6.5 The total number of representations made on the Pre-submission Plan / SA Report was 755, with these representations received from 149 representors. A summary of the main issues raised is presented within the Council's Statement of Consultation, but notable issues are as follows:⁵

⁵ http://www.stroud.gov.uk/info/plan_strat/statement_consultation.pdf

- With specific reference to Gloucester City, an issue raised was the extent to which efforts had been made to consider and meet unmet need from Gloucester City. In this regard, differing views were expressed on whether unmet needs from within the JCS area should be provided at the southern edge within Stroud District or at the northern edges of Gloucester within the JCS area.
- One of the key issues was the extent to which the overall housing provision figure of 9,500 for the period 2006-2031 would meet in full the objectively assessed needs arising from the District. A number of representors commented that the figure is too low, based on a number of points, including: (a) the interim and post recessionary nature of the 2011 projections, (b) the failure to address shortfall under the previous plan period, (c) the failure to apply a 20% buffer, (d) the failure to meet affordable housing needs; and finally (e) the adequacy of the SHMA update. There was also criticism related to the Council adopting a figure close to the lower end of the range recommended by the evidence base. An alternative view expressed was that the figure is too high.
- A number of sites were identified by representors as providing sustainable options for delivering a higher housing requirement or as better alternatives to the existing strategic allocations or as additional sites within smaller settlements to meet local needs.
- With regards to the Stroud Valleys allocations, representors commented, for example, that the site allocations are largely brownfield locations, with many constraints, including flood risk, complex access arrangements, adverse ground conditions and ecological and built heritage. The need to address these considerable constraints at a time when the economic climate is not conducive to residential development, was thought to present a significant risk to deliverability.
- With regards to the North East Cam allocations, representors commented, for example, that land at the northern end of the allocation at Box Road is unsustainable given its remoteness from the centre of the village, services, and amenities.
- With regards to the Hunts Grove Extension allocations, representors commented, for example, that the allocation does not accord with the Draft Joint Core Strategy for Gloucester, Tewkesbury and Cheltenham and the strategy of the City Plan which seeks to focus growth around the north, west and east of the Gloucester urban area. Another representor stated that the allocation relates to Gloucester city poorly in functional terms and does not promote natural travel routes into the city centre.
- With regards to the Sharpness Docks allocations, representors commented that the scale of the proposed development may be too large in this location. It would represent a considerable increase in the size of Sharpness which is not commensurate with the size, function or sustainability of the settlement. It is a relatively isolated settlement in the context of the District, with poor infrastructure and very limited services and facilities. Whilst there is employment associated with the Docks, there are very few other employment opportunities close to or within the settlement. The closest secondary education establishment is Catherine Lady Berkeley's School in Wotton-Under-Edge, approximately 10 miles from Sharpness. There is a small Co-op store in Sharpness but very few other services available within the town. The nearest supermarket of a significant scale is Tesco at Cam, some 7.4 miles from Sharpness. A development of 300 dwellings would therefore result in significant reliance upon the use of the private car and represent an unsustainable scale of development. If it were to be developed, careful consideration should be given to making development sustainable in transport terms. Other representors stated that amendments to the policy are required to avoid adverse effects on the internationally designated features of the estuary and to mitigate the risks of such effects; to conserve and enhance the Estate's natural and historic environment; to avoid the risk of conflict with the established uses on the Estate and to integrate with the existing residential community at Newtown.

2.7 Revisiting spatial strategy alternatives and site options (2014)

- 2.7.1 Following his initial review of the submitted Local Plan and the associated evidence and representations, the Government appointed Planning Inspector decided to conduct the Examination of the Plan in two stages.
- 2.7.2 Hearing sessions for Stage 1 ('strategic issues') of the Examination were held in April 2014. Following publication of the Inspector's Initial Conclusions on Stage 1 of the examination in June 2014, the Council agreed to suspend the examination in order to enable further work to be undertaken.
- 2.7.3 In particular, the Council determined a need to consider ways of meeting an increased housing requirement without resulting in a fundamentally different spatial approach or strategy, as recommended by the Inspector in his Initial Conclusions. Consequently, the Council reconsidered sites that had been considered positively in the context of the preferred strategy and developed a series of site combinations for testing ('Growth Scenarios'), including through SA.
- 2.7.4 Seven alternative Growth Scenarios were developed and appraised:
- **Scenario A** – Using the existing Plan allocations but increasing their capacities and/or extending them, reflecting views expressed recently through representations on the plan;
 - **Scenario B** – Maximising growth at the principal town, drawing on greenfield peripheral locations identified in 2011 but not subsequently taken forward;
 - **Scenarios C and D** – Growth in the M5 catchment area, drawing on two locations (Eastington and West of Stonehouse) identified in 2011 but not subsequently taken forward;
 - **Scenarios E, F and G** - Composite scenarios, combining elements of Scenarios A, B and C to achieve higher growth levels to a maximum of 13,200.
- 2.7.5 Summary appraisal findings are presented in Box 2.1, whilst Box 2.2 presents the Council's response to the appraisal.
- 2.7.6 A Post Submission Interim SA Report was prepared that essentially aimed to present an appraisal of alternative Growth Scenarios. Two versions of the report were prepared: 1) A September 2014 version, prepared in order to inform member deliberation; and 2) A final version in December 2014 for submission to the Examination.⁶
- 2.7.7 Within the Post Submission Interim SA Report, 'Part 2' (which answered the question: "What has plan-making / SA involved up to this point?") explained the work that had been undertaken to develop alternatives; and then 'Part 3' (which answered the question: "What are appraisal findings at this current stage?") presented appraisal findings in relation to the alternatives (i.e. the alternative Growth Scenarios).

⁶ Also, draft appraisal findings were presented to elected members at a meeting/workshop.

Box 2.1: Summary appraisal findings - Alternative growth scenarios (2014)

- **Air quality** is not a major consideration. There could be negative effects as a result of high growth on the Gloucester Fringe (given that there is an Air Quality Management Area located in Gloucester), along the A38/M5 corridor (given the location of one of the AQMAs in Gloucester) or very high growth in the vicinity of Stroud, but any effect is unlikely to be significant.
- There are notable issues in relation to **biodiversity**, although it is likely that any scenario could be delivered without 'significant' negative effects. Scenarios that are appraised as performing best are those that would *not* involve additional growth in the Stroud Valleys (given proximity to Rodborough Common), would *not* involve development North of Eastington (given proximity to the River Frome corridor) and *would* involve development at West of Stonehouse (a relatively unconstrained location). Another issue is the potential for recreational impacts to the Severn Estuary Special Protection Area. This is a subject that is the topic of ongoing investigation, as discussed within a separate Habitats Regulations Assessment (HRA) Report.
- The scores for '**climate change mitigation**' primarily reflect the degree to which each scenario would focus growth, i.e. involve development of large sites. Development of large sites can lead to economies of scale and hence delivery of low carbon heat/power infrastructure can become viable, as can ambitious approaches to sustainable design and construction.
- In terms of '**communities and wellbeing**' the appraisal suggests that scenarios perform well where growth would be concentrated at existing first tier settlements. Scenario E is predicted to result in 'significant' positive effects, given that the baseline situation is one whereby a lack of intervention leads to issues around access to services and facilities for an ageing population in the district. It is assumed that a 700 home scheme at North of Eastington would not perform well, although in practice there might be potential to build in measures that ensure good access to services and facilities for new and existing residents. On this basis significant negative effects are not predicted for any scenario.
- High growth scenarios are assumed to perform well in-light of sub-regional **economic growth** objectives that have been identified by the Gloucestershire Local Enterprise Partnership (LEP). The LEP has also identified the need to support delivery of new employment land in close proximity to M5 junctions, and this is reflected in the ranking assigned to the scenarios. It is suggested that the best performing (high growth) scenarios would lead to significant positive effects, whilst the worst performing (low growth) scenario would lead to significant negative effects; however, there is some uncertainty given that economic forecasting work is ongoing.
- The appraisal under the '**housing**' topic is driven primarily by a consideration of the degree to which each scenario is in-line with the findings of the recent Objective Assessed Housing Need Study, although there are possibly some other considerations besides relating to where within the district housing is focused (and hence the degree to which housing need associated with particular towns is met).
- Development of sites on the northern edge of Stroud is an important consideration from a '**landscape**' perspective given the potential to impact upon the Area of Outstanding Natural Beauty (AONB). Of the four scenarios that would not involve development on the edge of Stroud, (D) and (E) are best performing on the basis that a large scheme would come forward at West of Stonehouse, a location with a 'medium-low' rating assigned by the Landscape Sensitivity Appraisal (although development would impact upon a number of listed buildings). (D) performs slightly better than (E) on the basis that a smaller scheme might be progressed at North East Cam (assigned a 'medium' sensitivity rating).
- The discussion under the '**soil**' heading relates to some less fundamental considerations. There is a consideration of the proportion of growth directed to brownfield land, however it is important to bear in mind that a low growth approach focused on brownfield land does not necessarily perform well given that unmet housing needs would be met elsewhere (i.e. in a neighbouring district) and might well involve greenfield development. It is also noted that a high growth approach at North of Cam would likely necessitate extending the site footprint to the north, which would mean it intersects an area of higher grade agricultural land.
- Major assumptions are made under the '**transport and accessibility**' heading regarding the infrastructure capacity upgrades that would be delivered alongside development of large sites, although it is noted that in practice there can be little certainty at this stage. The highways agency has voiced concerns over the capacity issues at M5 junctions 12 and 13 that might arise as a result of certain Growth Scenarios (if it is the case that commuting by car is prevalent). Additional housing development in the Stroud Valleys is assumed to be a positive, although Aston Down is an exception.
- Flood risk is the primary '**water**' related issue that need be a focus of the appraisal. Flood risk concerns were voiced by the Environment Agency in 2013 in relation to the preferred approach, although concerns were subsequently resolved (though thorough application of the 'Sequential Test'). Under some of the scenarios sites would be developed for housing that are in flood risk zones and have not passed the Sequential Test – most notably land at Dudbridge – and so it is appropriate to conclude at this stage that these scenarios could lead to significant negative effects, i.e. it is appropriate to apply caution.

*Box 2.2: The Council's response to the alternative growth scenarios (2014)**Background*

When considering whether any further land for housing may be required, the Inspector stated that it was important that "any amendments to the Plan and its underlying strategy do not result in a fundamentally different spatial approach or strategy or result in substantial modifications which result in a significantly different plan" (para. 55). If the Council wishes to take an alternative course of action "withdrawal may be the most appropriate course of action" (para. 55).

This leaves the Council with relatively little room for manoeuvre. To avoid the risk that any changes to the Plan result in a fundamentally different plan, any consideration of reasonable site alternatives at this stage in the process should be based on sites which were considered positively in the context of the preferred strategy established during 2011/2012, which were based on the results of technical appraisal and were subject to public consultation. Introducing a new site at this stage which has not been through assessment in the context of the preferred strategy and has not been subject to public consultation through the plan process, would risk the Inspector concluding that the plan is fundamentally different.

Alternative Growth Scenarios

Seven alternative growth scenarios were identified, with a view to undertaking further testing and identifying the best performing scenario. Potential site options were grouped according to their relationship to the preferred locations identified in the Preferred Strategy (February 2012) document.

The scenarios were tested against sustainability appraisal criteria and were also assessed against Habitat Regulation Assessment (HRA) criteria. Also, the scenarios were tested to establish those that are most in accordance with the Local Plan's development strategy, with criteria covering: the extent to which growth would be concentrated at the first tier settlements; the size of urban extensions; and the ability to deliver jobs and provide access to public transport services.

The evidence suggests that Growth Scenario D performs better than other scenarios at delivering housing needs in the most sustainable way and in a way that accords with the Local Plan development strategy.

A final wider assessment has looked at planned housing distribution across the District and at the extent to which this reflects and promotes the relative role and function of existing settlements within the District. This analysis has identified that whilst 63% of the housing supply in the submitted Local Plan is identified at the first tier settlements of Cam, Dursley, Stonehouse and Stroud and south of Gloucester, only 3% is identified for Stonehouse, compared with 9% at Cam, 9% at Dursley and 16% at Stroud.

West of Stonehouse

Stonehouse is one of the most sustainable settlements in the District, for example it has the best employment density (ratio of local jobs to working residents) in the District and more people resident in the town work within the town compared with any other settlement. Stonehouse contains the third largest economically active population, and a good range of strategic and local facilities and services. The town also benefits from good transport links within the M5 corridor and a mainline station. On this basis, there is a case for additional housing required to be delivered at Stonehouse. The effect would be to ensure a good balance between planned housing supply and the role of settlements within the District.

Growth Scenario D involves the allocation of an additional mixed use allocation at West of Stonehouse. This site was recommended by the Council as a strategic mixed use allocation in the Preferred Strategy consultation document (Spring 2012) and was recommended as a reserve site by officers in July 2013. Although the site was taken out of the submitted plan, the site was assessed as part of the published Sustainability Appraisal (December 2013) and Infrastructure Delivery Plan (July 2013) which underpin the current draft Local Plan.

The site is fully in accordance with the development strategy as it involves a planned mixed use urban extension to one of the District's main settlements; it will deliver employment and housing (including over 400 affordable houses) together; and will bring forward significant infrastructure to support the development including a local centre, primary school, open space and community facilities. Whilst it is recognised that the current transport links between the site and the town centre are not ideal, there are opportunities through the allocation to improve these links. The site performs better than other strategic options and performed well in the Carbon Footprint Study (September 2011), in the Preferred Strategy Sustainability Appraisal (2012) and in the Sustainability Appraisal of alternative options published with the submitted plan (December 2013).

The additional allocation at Stonehouse will actually provide a better balanced housing distribution for the plan period, ensuring that Stonehouse, a first tier settlement, contributes 15% of the planned housing provision for the plan period, rather than the 3% contained within the submitted plan.

2.8 Developing proposed modifications (2015)

- 2.8.1 In light of consideration of alternative Growth Scenarios in 2014, the Council determined a need to modify the spatial strategy in-line with 'Option D', and also make a number of other changes to the plan.
- 2.8.2 The Council prepared and consulted on proposed modifications in February/March 2015, with an SA Report Addendum published alongside.
- 2.8.3 As per the SA Report (2013), and the Post Submission Interim SA Report (2014), the SA Report Addendum was structured in four 'parts'. Part 2 (which answered the question: "What has plan-making / SA involved up to this point?") explained the process of giving consideration to alternative Growth Scenarios; whilst Part 3 (which answered the question: "What are appraisal findings at this current stage?") presented appraisal findings in relation to the proposed modifications.⁷
- 2.8.4 Proposed Modifications and the SA Report Addendum were then published, with duly made representations submitted considered by the Inspector at resumed Stage 1 hearing sessions and the Stage 2 hearings, which all took place in May/June 2015.
- 2.8.5 Subsequent to the Stage 2 hearings the Council was asked to complete some 'homework'. One of the homework tasks completed in June 2015, and reported within Part 2 of the July 2015 SA Report Addendum, involved revisiting site options appraisal work. Site options appraisal findings were originally presented within the SA Report (2013), and then were presented in an updated form within the Post Submission Interim SA Report (2014) and the first SA Report Addendum (February 2015). However, some issues with the analysis were identified by site promoters, and hence there was a need to revisit the site options appraisal work for a final time within the July 2015 SA Report Addendum. Also, the opportunity was taken to examine two site options (which might be considered as alternatives) in additional detail. Box 2.3 presents the Council's response to the homework tasks.

⁷ Also, within 'Part 1' of the SA Report Addendum (February 2015) the opportunity was taken to present updated information on the SA scope, reflecting evidence submitted / issues raised through representations received on the pre-submission / submission plan.

Box 2.3: The Council's response to the site options appraisal work (2015)

The SA homework tasks have helped to provide clarity on some important matters, but have not ‘thrown up’ any issues that lead the Council to consider altering the proposed approach to site allocation, or indeed lead the Council to reconsider alternative spatial strategies (a task most recently undertaken in 2014 / early 2015).

Chapter 6, above, identifies that several sites in fact intersect grade 3 agricultural land, as opposed to grade 4 (i.e. lesser quality) land as was previously thought to be the case. This is a relatively minor consideration and not one that leads to a need to reconsider the proposed site allocations (or, indeed, seek to mitigate impacts through policy). A more important consideration is the need to preserve grade 2 agricultural land, as this land represents the best quality agricultural land in the district.

Chapter 7, above, explores the merits of two site options in some detail. This is helpful analysis, in that it builds upon other analysis completed by the Council over the years (e.g. work reported within the 2011 ‘Pros and Cons of Potential Locations for Strategic Growth’ paper). It is clear that the two site options in question both have pros and cons, but the Council’s position remains unchanged in that the Council believes Hunts Grove Extension to be the best location for an allocation on the southern edge of Gloucester. Whilst the analysis highlights Land at Whaddon as having slightly better access to existing community facilities, Hunts Grove Extension will form part of the wider new Hunts Grove community, and hence will be served by a range of new community infrastructure. Hunts Grove Extension will support and extend the community infrastructure planned for in this location and help to ensure a critical mass is achieved whereby a cohesive new community develops.

2.8.6 In light of these steps, and the Inspector’s confirmation of the recommended housing and employment land requirement figures following the resumed Stage 1 hearings, the Council was able to determine a preferred spatial strategy (see Table 2.5) and prepare further proposed modifications, which were then published in July 2015.

Table 2.5: The final preferred spatial strategy

Strategic Sites	
Hunts Grove Extension	750
North East Cam	450
Sharpness	300
Stroud Valleys	450
West of Stonehouse	1,350
Non-site specific allowance	
Council housing programme	150
Windfall	750
Total	At least 4,200

2.8.7 Again, an SA Report Addendum was published alongside and structured in four ‘parts’. Part 2 (which answered the question: “What has plan-making / SA involved up to this point?”) explained about the ‘homework’ completed by the Council; whilst Part 3 (which answered the question: “What are appraisal findings at this current stage?”) presented appraisal findings in relation to the further proposed modifications.

2.8.8 Table 2.6 presents conclusions reached in relation to the further proposed modifications, and the ‘plan plus proposed modifications’.

Table 2.6: Conclusions reached by the July 2015 SA Report Addendum

Topic	What is the likely effect of the Further Proposed Modifications in isolation?	What is the likely effect of the Local Plan as a whole, taking into account the Further Proposed Modifications?
Air	No notable effects	Significant negative effects are unlikely
Biodiversity	No notable effects	Significant negative effects are unlikely
Climate change mitigation	No notable effects	No significant effects
Community & wellbeing	Positive effects	Significant positive effects
Economy & employment	Minor positive effects	Significant positive effects
Housing	Significant positive effects	Significant positive effects
Landscape & heritage	Minor positive effects	Significant positive effects
Soil	Negative effects	Significant negative effects
Transport & accessibility	Positive effects	Significant positive effects
Waste	Minor positive effects	No significant effects
Water (inc. flood risk)	Positive effects	Potential/uncertain significant negative effects

2.9 Finalisation of the plan (2015)

- 2.9.1 The Inspector published his report on the Stroud District Local Plan on 2nd November 2015. The report concludes that the plan provides an appropriate basis for the planning of the district until 2031 providing a number of modifications are made to the plan. Specifically, the modifications that should be made to the plan are those that the Council had previously published for consultation. Having considered representations made on proposed modifications, the Inspector did not consider it necessary to adjust them at all.
- 2.9.2 Pages 2 and 3 of the Inspectors Report discuss the SA process, under the heading of ‘Assessment of Legal Compliance’, stating that:
- “At the hearing sessions of the examination, some participants expressed concern about the Sustainability Appraisals (SA), particularly in terms of the nature and extent of public consultation undertaken and the consideration of alternative strategies and sites. SDC has responded to these concerns and I am generally satisfied with these responses.”*
- 2.9.3 Substantive conclusions reached by the Inspector, in light of SA documentation and consultation responses / representations received, include the following:
- “Throughout the preparation of the SDLP, SDC has considered several **alternative levels of housing provision**, and assessed these through SA. Most recently, when considering the latest housing requirement, SDC assessed seven levels of housing provision, ranging from 9,900-13,200 new dwellings. This work found that the lowest provision levels could be accommodated by increasing the capacities of sites proposed in the original SDLP; the highest levels would have serious site specific adverse effects and could not be accommodated within the current development strategy; but intermediate levels of 11,200-11,750 dwellings could be accommodated within the current strategy, with additional allocations, such as the West of Stonehouse site; all these options were tested through SA. SDC has fully assessed and considered a reasonable range of realistic growth options

based on various levels of housing provision, and has selected a housing requirement figure of 11,400 dwellings, which fully meets the objectively assessed housing need... Cross-boundary housing provision is an important issue, particularly when the housing market area crosses administrative boundaries. This matter is dealt with in more detail under the Duty to Co-operate, earlier in my report. However, at this stage, it is important to note that the appropriate strategic housing market area covers Gloucestershire, which is addressed in the SHMA work [PS/B18; PS/E13]. The assessment of housing need carried out for Stroud is comparable and consistent with the approach adopted for other areas, including the JCS authorities. This enables a county-wide view to be taken across the wider housing market area on the overall level of housing required to meet population and household needs and support economic growth, having considered issues such as commuting and the inter-relationship between the local housing markets... Moreover, at present there is agreement between Stroud and the JCS authorities that each area should fully meet its own identified housing needs within its own area; there are currently no unmet needs from Stroud that have to be met elsewhere or from neighbouring authorities that have to be met within Stroud [REX/B09]. If the situation changes, then the commitment to review the SDLP in Policy CP2 comes into play; this would consider the nature and scale of any unmet needs and determine how and where they should be met, working together with the relevant authorities under the Duty to Co-operate... I therefore consider that a housing requirement figure of 11,400 new homes (2006-2031) represents an objective, realistic and deliverable housing requirement figure, which meets demographic needs, reflects housing market signals, and includes a modest uplift to reflect the need for affordable housing, economic trends, local policy objectives and other relevant factors.”

- “The consideration of **alternative strategies, options and sites** featured regularly in the discussions at the hearing sessions. SDC has explained how alternative strategies, options and sites had been considered during the plan-making process [PS/B10]. Reasonable alternative strategy options were identified and assessed at the Key Issues stage [CD/E1], including concentration and dispersal options; at Alternative Strategies stage [CD/E2; CD/F6/F8], when 7 alternative growth scenarios were assessed using a combination of themed distribution options to identify the best performing scenario; at Preferred Strategy stage [CD/F15-F16; CD/D7; CD/E3], where alternative strategies to identify a preferred approach were assessed, including alternative site locations; and at Submission Plan stage [CD/F17-F18; CD/A4a], where final appraisal, including alternative growth and distribution options were assessed. Alternative growth scenarios were also assessed when higher housing requirement figures were identified in 2014 [PS/E17-E18], along with specific site alternatives. As confirmed in the assessment of legal requirements, the consideration of alternative strategies, options and sites were assessed in SA reports, including at the later stages of plan-preparation... These assessments have considered not only reasonable alternative strategies, but also alternative locations and spatial distributions of development, including in the south of Gloucester fringe and throughout the whole of Stroud district. SDC has considered all the alternative and additional sites put forward by landowners and developers at various stages of the plan-making process. In saying this, I particularly note the PPG guidance [ID:11] which does not require a specific set of alternatives to be considered at every stage of the process, providing reasons are given for selecting and rejecting particular alternatives. Having considered all the evidence, there is no doubt that SDC has considered all reasonable and realistic alternative strategies, scenarios, options and sites at various stages throughout the preparation of the SDLP, with a full assessment of their advantages of disadvantages and reasons for rejecting and selecting particular alternatives. Consequently, as amended [MM001-021], the development strategy is effective, locally distinctive and appropriate for Stroud district. It is justified with robust, proportionate and credible evidence, particularly in terms of the proposed amount of housing and employment development.”
- “Around 40 alternative or additional “**omission**” sites are promoted by developers or landowners. However, since the SDLP fully meets the identified housing requirement and none of the strategic sites have been found undeliverable, unviable or otherwise unsound, it is not necessary to consider these other sites in detail; none of these “omission” sites are needed to deliver the preferred strategy. SDC has considered all the other sites being

promoted at various stages of the local plan preparation process [PS2/B02m/n], and none perform better in terms of overall sustainability appraisal than the proposed sites... Many of these omission sites would not reflect the underlying strategy of the SDLP. Further large-scale housing developments in the south of Gloucester fringe (such as at Hardwicke or Whaddon) would shift the focus away from the main settlements in Stroud district and involve greenfield sites on the fringe of Gloucester city. These sites perform no better than SDC's preferred site at Hunts Grove and would not have the benefits of consolidating committed development and utilising the new infrastructure being provided there. At Hardwicke, largescale development of up to 1,500 dwellings could remove the distinct identity of Hardwicke village from the urban area of Gloucester. Land at Whaddon is essentially an area of search for up to 3,000 dwellings, but there is some uncertainty about the precise amount or extent of proposed development to meet Stroud's needs in terms of a specific allocation; development here would also represent a major incursion into the countryside to the south of Gloucester. Whaddon also performed less well in comparison to the proposed strategic site at West of Stonehouse. Furthermore, GCC currently objects to any further development in the south of Gloucester fringe within Stroud district... Many [other] sites involve greenfield land outside settlements, particularly those lower in the hierarchy, without a full range of facilities and services; these sites would not fall within the SDLP's strategy. Some sites are not well related to the size and character of the existing settlement, and many have landscape or heritage issues or specific constraints which might prevent or delay their development. These include sites at Chalford, Minchinhampton, Upton St Leonards, Kings Stanley, Painswick, Kingswood, Rodborough and Whitminster, some of which are ruled out due to their location within the Cotswolds AONB or proximity to Rodborough Common SAC. SDC has considered a specific site east of Berkeley as a possible allocation, but there are landscape and heritage issues, including impact on Berkeley Castle, with objections from EH/HE; a recent planning application was refused [PS2/D12]. Further development south of Sharpness might complement the new Science & Technology Park, but few details are available; the site would be some distance from strategic facilities and could have an adverse impact on the Severn Estuary SAC.... Alternative sites around Cam and Dursley, such as Elm Lodge, Lower Knapp Farm and land east of Dursley, would represent a significant intrusion into the surrounding countryside, with adverse impacts on the landscape and setting of the settlement. Alternative sites around Stonehouse raise issues of landscape, heritage and wildlife impact. Most of the alternative sites promoted around Stroud are within, or would have an adverse impact on, the Cotswolds AONB; others, like Dark Mill/Lewiston Mill, already have permission for new housing. Some sites, like Aston Down, are remote from the nearest settlement and lie within the AONB, whilst others have poor access. Some are too small to be considered as strategic allocations, and in some cases, the deliverability and developability has not been demonstrated... In particular, none of the other sites promoted by developers would include a mix of uses, including employment uses, a key requirement of strategic site allocations in the SDLP's strategy. Consequently, since there is no need to identify any additional or alternative sites to meet current housing requirements, and none of the suggested sites perform better than those proposed in the amended SDLP, it is not necessary to consider these as additional or alternative allocations."

3 MEASURES DECIDED CONCERNING MONITORING

- 3.1.1 Whilst the SA Report presents ‘measures **envisaged** concerning monitoring’, this SA Report Adoption Statement presents ‘measures **decided** concerning monitoring’.
- 3.1.2 Presented within the SA Report was a review of the Council’s proposed monitoring framework, with particular indicators highlighted as being important ‘from an SA perspective’, i.e. given the effects and uncertainties predicted through appraisal - see Table 2.7.
- 3.1.3 Also, the following recommendations were made:
- The Council propose to monitor ‘Percentage of granted planning permissions within areas of biodiversity value’ and ‘areas of net biodiversity gain’. Monitoring of biodiversity is important (the appraisal concludes that negative effects are unlikely, but this conclusion is somewhat uncertain). It is recommended that these broad monitoring indicators are developed further so that they are specific and measurable.
 - The Council propose to monitor ‘Percentage of development approved in areas where there is a need to take account of landscape character’. Again, given that the predicted effects of the Plan are somewhat uncertain it is recommended that this broad monitoring indicator is developed further so that it is specific and measurable.
 - The Council propose to ‘calculate carbon emissions in the District against a baseline and monitor changes to assess achievement against any targets’. It is recommended that there should be a particular focus on emissions from transport and emissions savings as a result of decentralised renewable / low carbon energy generation.
- 3.1.4 The Council proposed modifications to the monitoring indicators related to heritage assets, to reflect the views of statutory bodies, but did not propose any other substantive changes to the monitoring framework. This is understandable given that monitoring is a resource intensive undertaking, involving much coordination between partner organisations. Broadly, the Council’s proposed monitoring framework is supported from an SA perspective.

Table 2.7: A selection of monitoring indicators proposed by the Council

PROPOSED INDICATOR	THIS INDICATOR TO BE IMPORTANT BECAUSE...
Number of annual housing completions	Predicted positive effects in relation to 'housing' are based on the assumption that housing will be <i>delivered</i> at the sites allocated.
Phasing targets	Predicted benefits reflect the assumption that appropriate phasing will ensure development of cohesive communities and minimise car dependency / need to travel
Strategic Planning Allocations permitted using the policy principles	Predicted benefits reflect the assumption that strategic developments will be master-planned to reflect strategic priorities
Quantum of housing development meeting housing mix identified in SHMA	Predicted benefits reflect the assumption that strategic developments will be master-planned to be mixed and inclusive.
Percentage of granted planning permissions for sites of 4 or more or sites larger than 0.16 ha with 30% or more affordable housing	Predicted positive effects in relation to 'housing' are based on the assumption that affordable housing will be delivered at the sites allocated.
Quantum of land developed by employment type and location	Predicted positive effects in relation to 'economy and employment' are based on the assumption that particular strategic (spatial) economic objectives will be realised.
Number of permitted schemes with accompanying public transport facilities included within 400 metres	Predicted benefits reflect the assumption that strategic scale development will lead to opportunities for residents to reduce car dependency.
Amount of new hedgerows and woodland.	Predicted benefits reflect the assumption that strategic scale development will lead to opportunities for green infrastructure delivery.
Amount of woodland and hedgerows being managed	As above
Quantity of green space provision in strategic development areas.	As above
Total distance (metres) of restored Canal.	Predicted benefits reflect the assumption that the canals will be used for walking/cycling and recreation.