



# Stroud District Local Plan Review

Emerging Strategy Consultation  
Report – Part Two

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Planning  
for our future



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# 1. Introduction

In November 2018 Stroud District Council consulted on its Emerging Strategy as part of the Local Plan Review and a report containing quantitative headline results was published in May 2019 and is available to view on the Council's website at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)

This report provides more detailed summaries of public comments submitted in response to the consultation and a Council response to each section that summarises how comments have been taken into account in the Draft Plan.

## 2. What you told us....

### Key Issues

#### Qu. 1.0a Have we identified the top 5 issues for you?

Comments received regarding the top 5 key issues focused on the lack of reference to the following:

- Reducing our collective carbon footprint, adaptation for the consequences of climate change impact and the need to work towards the Council's aim to be carbon neutral by 2030.
- Stroud's historic environment, cultural heritage and associated distinctiveness.
- Conserving the landscape or firm protection of open spaces and footpaths.
- Developing a tree strategy.
- Delivering the full housing requirement.
- Prioritising the reuse of brownfield sites.
- Improving the walking and cycle network.
- Managing parking issues.
- Providing suitable housing for older people.
- Meeting the needs of young people through sport, recreation and schooling.
- Building good quality homes and communities, health, food independence and education and training, conversion of underused buildings.
- Protecting the best of the remaining environment with a need to do more than 'mitigate' and 'avoid'.
- The lack of emphasis on existing inadequate infrastructure and putting infrastructure in place before development.
- A clear indication of how the Green Infrastructure Strategy will be given a statutory footing to ensure delivery.
- A much greater focus on prioritising making the whole of the housing market affordable to people on typical incomes.



- The local economy and job provision, with a need for meaningful economic growth in the District to allow growth and expansion of established local businesses as well as encouraging new business.

**Qu. 1.0b Do you agree with the ways we intend to tackle these issues?**

Suggested ways to tackle the key issues focused on the need to increase consultation with the following:

- Local communities.
- Providers of affordable housing to emphasise the Council’s proactive approach to maximising the supply of affordable housing in Stroud District.
- Relevant conservation and wildlife groups to ensure ecological impact studies are both independent and thorough.

**Council’s response**

Many of the points raised during consultation are now reflected in the key issues, the vision and objectives, and/or the development strategy for the Plan. The need to work with local communities, affordable housing providers and key stakeholders, including wildlife groups is recognised and will be important to ensure effective delivery of identified policies and proposals. The importance of reducing our carbon footprint has been reinforced by the Council’s declaration of climate emergency and its commitment to delivering Carbon Neutral 2030. This is now reflected as the key issue for the Plan.

## Local Economy and jobs

**Qu. 2.1a Do you agree with the ways in which the Emerging Strategy intends to support the local economy and the creation of jobs?**

The consultation report published in May 2019 presents the key findings from this question. The report can be viewed in full at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)

**Qu.2.1b Do you support an alternative approach? or have we missed anything?**

The following areas were identified as those the Plan should address when focusing on the local economy and the creation of jobs:

- The need for a sustainable local economy resilient to the impact of climate change.
- The need to end preoccupation with economic growth and instead be flexible to enable growth to be scaled down if development pressures are reduced
- The need for the Plan to have a clear economic growth strategy before allocations are identified.
- All new business developments should have to meet strict energy efficiency targets and provide some of their own renewable power.



The following **areas** were thought to need addressing in the Plan:

- Home working is the fastest growing area of employment.
- Strategy for addressing ageing working population.
- When land is no longer viable for employment-related development.

**Concern** was raised over the following points:

- People may not want to live and work in the same place – new communities will become dormitories and lead to an increase in commuting
- Warehousing and depots offer limited employment per square foot as much of distribution is automated.
- Farm diversification and tourism development are being permitted without stringent planning controls to mitigate potential impact on the local environment.
- Stroud does not currently benefit from a modern business park
- There is a significant risk to low skilled jobs in the economy from automation.
- The current land supply is controlled by too few developers.

In suggesting **alternative approaches** to strategic employment provision the following were raised:

- Ensure that people are able to live and work in close proximity. Co-locating housing and employment significantly assists in creating economically viable higher quality bus services which are needed to ensure developments are socially and economically inclusive
- Employment opportunities need to be developed early or in tandem with housing and infrastructure to reduce the need to travel
- Policies should actively encourage home working
- Housing and employment sites should be located close to major transport links such as A38 and M5 but need to maximize use of public transport links.
- Stroud is a rural district and development should be limited and dispersed between smaller towns and villages with sufficient farmland retained for future food production
- Large allocations are taking time to come forward. The strategy may need to support the delivery of smaller sites
- Redevelopment of employment land should be looked at pragmatically and triggers should be included within policies
- Redevelopment should be firmly controlled and evidence should be clear to justify loss. Mixed uses are preferable to total loss
- Improved access to rail network is critical to economic success. Support reopening Charfield station and Stonehouse rail station.
- Planning policy should provide in some circumstances for change of use which supports employment – e.g. education and training centres, day nurseries, gyms and sporting facilities
- Support businesses at all stages of their development: Consider the provision of incubator units to cultivate new businesses and small units within housing developments as well as larger premises.



- Encourage temporary office space/cafes in new village developments so that home workers can meet each other and co-workers/clients close to home.
- Locate co-working throughout the District not just town centres, being mindful that most of the existing "hubs" involve cars and car parking issues.
- Providing opportunities to encourage co-operatives to be formed.
- Develop proactive engagement with targeted industries/growth markets/expanding businesses that have a good fit with the District to bring new businesses to the area.
- Review local business rates for small businesses to foster small-scale, creative, local economic activity
- Higher speed broadband provision for employment premises is key to jobs. Developers should be required to provide the network.

It was suggested that the Plan should have more focus on the following **sectors**:

- High tech businesses - a high tech cluster for emerging companies should be developed in conjunction with local colleges and schools.
- Jobs that conserve and enhance the Cotswolds AONB and ecological networks, including through promoting traditional rural skills and local produce,
- Green technologies including green energy production, low carbon domestic and industrial building technologies, home-grown food and supporting sustainable farms or community food-growing projects and eco-tourism
- Sport employment sector that has a high direct economic value to Stroud District and there are indirect benefits from the related health economy.
- Although there has been a dramatic reduction in freight on our commercial waterways, the Gloucester & Sharpness Canal can still be used to carry freight and links into the River Severn navigation at Gloucester.
- The economic value of the historic environment should not be underappreciated
- Stroud's natural environment as an asset that provides a competitive advantage to attract businesses and talent to the area

The following **locations** were suggested as having **potential** for economic growth:

- Strengthen public transport links to unused industrial land in Gloucester instead of building in areas of historic or natural beauty.
- Further land near to the M5 J12 and J13.
- Non A38/M5 growth corridor locations i.e. Stroud, Cam & Dursley, Berkeley and south Gloucester areas.
- More emphasis should be placed on the economic needs of the Cam community and how employment is to be delivered.
- Focus new tourism development on the canal corridors to appreciate the environment for living and wildlife benefits. Prioritise the linkage of the Stroudwater navigation to the Sharpness Canal to enable tourist access by water



- Existing tourist "hot spots" – e.g. Slimbridge and Berkeley should be supported by strategic public transport developments.

**Concerns** were raised with focusing economic growth in the following **locations**:

- Concentrated growth i.e. at Stonehouse, causes congestion and pollution. Air quality should be measured.
- The focus on the A38/M5 growth corridor may be limiting.

### Council's response

The Council, together with other local authorities in Gloucestershire, has recently commissioned an Economic Assessment of the Gloucestershire economy and will shortly be commissioning work on employment land supply. The detailed comments arising from public consultation will be considered as part of this work. The Local Plan now proposes a significant increase in employment land at a variety of locations to reflect the needs of our local communities and the market.

## Our town centres

### Qu. 2.2a Do you agree with the ways in which the Emerging Strategy intends to support the District's town centres?

The consultation report published in May 2019 presents the key findings from this question. The report can be viewed in full at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)

### Qu. 2.2b Do you support an alternative approach? or have we missed anything?

Comments received regarding **Dursley Town Centre** focused on:

- The need to manage traffic flows and reduce traffic congestion through the town. A suggestion to achieve this included the widening of Silver Street.
- The potential to regenerate the area to make the town centre more attractive to businesses and visitors with particular focus on filling redundant shops and regenerating the area around Church Street/Water Street/Long Street.
- Marketing Dursley as a tourist and Cotswold way location as a strategy to help increase the number of visitors to the area.

Comments received regarding **Nailsworth Town Centre** focused on:

- Maintaining the free parking which is considered to be integral to the town centre's success.
- Designing a clear and effectively enforced policy on design in the town centre with a focus on signage, shop fronts, piecemeal alteration to existing buildings
- Implementing a long term plan for better and consistent street furniture, paving and surfacing to bring about gradual improvement.

Comments received regarding **Stonehouse Town Centre** focused on:

- The need to address parking at the railway station.
- The provision of long stay parking in the town centre.



- Consideration of the connection between Stonehouse and Gloucester-Bristol line.
- Reducing business rates for businesses within town centres to encourage chains to come in.

Comments received regarding **Stroud Town Centre** focused on:

- Implementing stricter planning controls on shop fronts and upgrading signs and street furniture.
- Better provision of green infrastructure, with particular focus on the market square
- Improving parking within the town centre
- Using better signage to improve the link between the town centre and the Museum in the Park and art facilities
- Improving accessibility to the town centre for cyclists and walkers. Current proposals for the redevelopment of Merrywalks was seen as one of the solutions to the current barrier
- Improving cycling links to the wider Stroud Valleys network, with particular focus on routes towards Horsley.

Comments received regarding **Wotton-under-Edge Town Centre** focused on:

- The need for more off street parking provision within the town centre and examination of providing well lit walking routes to parking on the edge of the town.

**General comments** received regarding the District's town centres focused on:

- A need to recognise that the demands for high street shopping is declining and the need to manage this by changing use of retail outlets at the edge of town and concentrating retail use in the centre which will then reduce the number of empty shops.
- Changing the focus of town centres away from retail use only, to include social and recreational spaces. Greater emphasis on provision of small residential units in town centres to meet demands for affordable housing and to help revitalise town centres.
- The need to give greater consideration to smaller town centres i.e. Berkeley, Minchinhampton and Painswick
- Aligning the approach to town centres with the Council's carbon reduction targets, contributing to their achievement, and addressing necessary adaptation to the effects of climate change.
- Referencing the importance of street trees and amenity trees within a town centre setting as a way of offsetting carbon and improving the quality of public spaces.
- The need to consider the viability of town centres also needs to be taken into account when deciding on the location of new development
- Supporting smaller local businesses by reducing rates and encouraging more people to come into town centres by reducing parking charges or offering free parking after 3pm
- Consideration for the provision of charging infrastructure for electric vehicles.
- Providing better access to town centres through better bus services for rural communities
- Detailing how new businesses will be encouraged to move into high streets



### **Council's response**

The Local Plan recognises recent retail trends and puts in place a more flexible policy approach to support complimentary uses within the town centre, whilst continuing to protect the primary retail frontages for shopping. The comments relating to individual town centres are particularly welcome as it will be important for each town centre to build upon its unique attributes to ensure it continues to retain vitality and viability moving forward. Those non-land use planning comments will be taken into account by the Council as a whole. Various changes have been made to the Draft Local Plan to reflect comments made.

## **A local need for housing**

### **Qu. 2.3a Do you agree with the ways in which the Emerging Strategy intends to meet local housing need?**

The consultation report published in May 2019 presents the key findings from this question. The report can be viewed in full at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)

### **Qu. 2.3b Do you support an alternative approach? Or have we missed something?**

Comments received focused on a number of areas:

#### **Carbon footprint**

- The Emerging Strategy's approach to housing needs should be reviewed and revised in the light of the Council's 2030 pledge. It must be aligned with the Council's carbon reduction targets, contribute to their achievement, and address necessary adaptation to the effects of climate change.

#### **Housing numbers and deliverability**

- The new housing delivery rate is a major step up on past planned levels and past delivery rates.
- There is no definition given as to what is 'local need' and how the 40% increase in housing need has been calculated.
- There should be a thorough review of the 7,100 dwellings already stated as committed to ensure they are deliverable.
- The housing growth figure of 638 dwellings per annum may increase as new household and affordability data is published. It should be above the minimum requirement to provide a degree of boost as sought by Government. An uplift may also be required to support the District's economic growth assumptions.

#### **Affordable housing**

- The consultation is not specific enough on the proportion of social housing. It distinguishes criteria between different areas, but not the proportions.



- Any emerging policy for affordable homes should be subject to vigorous viability assessment.
- Although there has been some council-sponsored building in the District there is no mention of how the District can play a part in the supply of affordable housing.
- The standard method doesn't provide for specific affordable housing requirements or the specific emerging needs of the elderly.
- Enforce a minimum 30% affordable housing / 50% of the new houses need to be solidly built affordable homes. The current policy doesn't work and needs a statement committing to its enforcement.
- There should be stronger policy to ensure all housing sites which are not self-build or community projects are forced to provide affordable homes at a minimum specified rate.

### House types

- There are too many houses planned for large families when statistically families are breaking down and housing for single persons/starter homes are needed.
- The Plan should ensure that a suitable mix of development types are available across a wide choice of locations.
- The Plan should be flexible and should not seek to be prescriptive with regard to specific housing mix through individual policies for each allocated site.
- There is a need for houses to support multigenerational living
- Life time homes should be incorporated into the housing strategy
- Consideration should be given to a single site exception policy for individual self build housing on same basis as HC4.

### Council's response

The Council has now received the results of the Local Housing Needs Assessment, which provides further detail on how the Government's standard method for calculating the housing requirement has been applied to Stroud District. The results of the assessment will support the provision of affordable housing, homes for older people and details the house types needed. The Draft Plan provides a more robust policy framework for ensuring new housing reflects needs whilst also providing for self build and custom build housing, homes for first time buyers and renters, homes for older people and some flexibility for new market homes in smaller rural communities, subject to local support. The newly approved Council's Housing Strategy sets out how the Council will deliver and facilitate new housing to meet the needs identified.

## Local green spaces and community facilities

### Qu. 2.4a Do you agree with the ways in which the Emerging Strategy intends to protect existing or deliver new local green spaces and community facilities?

The consultation report published in May 2019 presents the key findings from this question. The report can be viewed in full at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)



## Qu. 2.4b Do you support an alternative approach or have we missed anything?

Responses raised a number of areas within local green spaces and community facilities that were felt to be missing from the Emerging Strategy. These include:

- The effect of increasing sea level due to climate change does not seem to have been quantified in assessing the risk to low lying areas of the District.
- Allotments, community orchards and green spaces as they are beneficial to wildlife.
- Provision for cemetery space
- There is no mention of the Cotswold Way, Cotswolds AONB, Gloucester to Sharpness Canal, Rodborough Common, Rodborough Fields and Selsley Common
- The strategy does not contain enough guarantees and absolutes about how the Council will protect/enhance local green spaces and community facilities.

The following were suggested as **alternatives** approaches to protect existing or deliver new local green spaces and community facilities:

- The approach must align with the Council's carbon reduction targets, contribute to their achievement, and address necessary adaptation to the effects of climate change
- Green Infrastructure networks should be designed into new developments from the outset to provide routes for wildlife and people. Routes for wildlife need to allow travel at ground and tree top level and via waterways. Fences between gardens should be designed in such a way that they allow the passage of small animals such as hedgehogs between gardens.
- Biodiversity should be integrated into every aspect, not as a standalone issue.
- Additional health and wellbeing benefits could be achieved by requiring active design principles and Building with Nature principles to be applied, to support behaviour change to more active lifestyles amongst those unlikely to use formal sports facilities.
- The long term plan should recognise the known benefits of being in or around water and consider blue spaces in addition to green spaces.
- The Plan should recognise that informal green open spaces also have great value to communities and should be protected.
- The impact of new development on currently designated nature areas, AONB's, SSSI's, RAMSAR, SAC, SPA, or other green spaces must be carefully monitored and managed.
- The protection and enhancement of the Cotswolds Area of Outstanding Natural Beauty and the importance of the Cotswold Way National Trail to the Stroud District, should be referenced on page 21
- Independent ecological surveys, undertaken by developers should be validated objectively by other organisations
- The walking and cycle routes from Cam to Slimbridge and onto Frampton and the towpath between Frampton and Cambridge need improving to encourage people to use alternatives to the car.



The following **standards** were suggested:

- A set of standards for local open space, sport and recreation and community facility provision, to guide future development.
- Defined rules and a strategy to encourage the positive management of green spaces.
- Reference to minimum standards set down by the Building with Nature benchmark developed by Gloucestershire Wildlife Trust should be inserted into Core Policy CP8

The following were suggested as ways to **deliver** local green spaces and community facilities:

- Ensure Community Infrastructure Levy and section 106 funding actually deliver community benefits.
- The Council should work collaboratively with the local NHS/voluntary sector to provide more social type activities for the older community and vulnerable adults.

### Council's response

The Draft Plan now takes full account of the results of the Open Space, Green Infrastructure, Sport and Recreation Study, which recommends new provision standards in the District for green infrastructure, playing pitches and recreation space. Standards for new housing development now include the requirement to address the need for allotments and community orchards. Policies in the Draft Plan also support the provision of the cycling and walking network and the completion of the Stroudwater Canal which will also provide opportunities for extending the green infrastructure network.

## A vision for the future

### Qu. 3.1a Do you agree with the vision for 2040 as drafted?

The consultation report published in May 2019 presents the key findings from this question. The report can be viewed in full at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)

### Qu. 3.1b Do you support an alternative approach or have we missed anything?

The Council received a number of responses that focused on the style and content of the District's vision. The Vision was thought to be:

- Too vague and in need of more detail
- Simple and uninspiring
- More of a statement of what is important now, rather than a vision to see us through the next 20 years.
- An excellent place from which to start but does not create a sense of ambition or direction of travel.
- Lacking explanation of what 'nurture our high quality landscapes' actually mean
- Lacking clarity of what the plan will result in for Stroud at the end of the period.



- Missing the words 'will' and 'improve' and missing reference to the elderly, high tech industries, Cotswold National Trail, Gloucester to Sharpness Canal, the use of brownfield sites and future transport modes.

There was concern over whether the vision was achievable and that it lacked detail on what is going to be done to achieve it, the challenges and the threats to its success. The issue of how to measure its success was also raised.

The Council received suggestions of **alternative approaches** and that the Vision should:

- Adopt the timeframe of 2050 to keep in line with other Local Authorities in Gloucestershire
- Be much more ambitious in light of recently agreed zero-carbon targets and declaration of climate emergency.
- Lead the way and be a trail-blazer of genuine sustainable policy,
- Embed the Green Infrastructure pledge as well as informing the objectives of the strategy.
- Recognise, and make aspirations to accommodate, new homes and jobs in the right places.
- Make more direct reference to the future strengthening of smaller settlements and surrounding villages, particularly those which provide key services and employment.
- Reflect different needs of towns and villages which are not always the same.
- Be fully in tune with and reflect other parish councils' Neighbourhood Plans.
- Mention of protecting our landscape and heritage as assets for the future
- Encourage tourism and the marketing of the District as an interesting destination
- Include reference to planning for the delivery of necessary strategic road infrastructure

### Council's response

The Council has amended the Vision for 2040 having taken into account all comments received from the Emerging Strategy consultation. In particular, the Vision now reflects CarbonNeutral 2030, travelling in sustainable ways, reflecting on employment growth sectors, supporting older people and providing opportunities for young people and the needs of villages and rural communities.

## Strategic objectives

### Qu. 3.2a Do you agree with the Strategic Objectives as drafted?

The consultation report published in May 2019 presents the key findings from this question. The report can be viewed in full at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)

### Qu. 3.2b Do you support an alternative approach or have we missed anything?

Comments received described the objectives as merely statements, that will become objectives when they can be realistically delivered against an identified main issue that the plan is seeking to address. They were also thought to be:

- Aspirational



- Of no great depth
- Very vague and open to misinterpretation.

It was felt that the objectives were misnamed and more akin to strategic aims, as they are general and contain no measurable element that can be monitored. They should be focused, specific, containing measurable elements and often time bounded.

It was felt that a number of areas have been missed through the development of the strategic objectives or have been given low priority. Some wording was thought to require further clarification:

- Education seems to have been missed
- An objective to encourage water efficiency
- Heritage should get a higher profile
- The way in which strategic objectives are derived from and link to other elements of the strategy should be made much clearer
- There is no mention how the Council propose to carry them forward including the cost of maintaining them

Suggested revisions to the strategic objectives included:

- Carbon neutral 2030 commitment should become the main objective in the Emerging Strategy.
- They should better relate to specific settlements/geographical areas within the local authority area, which follows through from the Vision.
- Reduce the number of objectives by combining objectives 1 and 1 a and objectives 2 and 3.
- They need to recognise the requirement to meet the housing targets set out in the Government's Standardised Housing Number Methodology
- An additional strategic objective included under the heading of 'Homes and Communities' to meet both market and affordable housing need in order to demonstrate Stroud District's commitment to providing a sufficient supply of homes to meet the objectively assessed housing need.

Additional comments received suggested changes to wording and alternative approaches to the strategic objectives:

#### **Strategic Objective SO1: Accessible communities**

- It should include recognition of the specific needs of an ageing population.
- Garden village concept contradicts this objective
- The housing element of Strategic Objective SO1 should be more aspirational.
- 'Decent housing' gives the impression of mediocrity rather than higher standards of urban design, masterplanning, architecture and living space which the local planning authority should be seeking.
- There should be an additional bullet point: Supporting villages providing vital services and employment in rural areas
- It does not go far enough in relation to the Top Key Issues and Key Issue 1



### **Strategic Objective SO1a: Healthy, inclusive and safe communities**

- Needs to include recognition of the specific needs of an ageing population.
- It should refer to Active Design Guidance regarding creating new communities.
- It should be revised to take account of what the role and function of the Plan is in housing terms and should be better aligned to mirror Economic Objective SO2, which identifies that there is a need to provide a very strong diverse and vibrant local economy.
- It does not go far enough in relation to the Top Key Issues and Key Issue 1

### **Strategic Objective SO2: Local economy and jobs**

- No mention of high-tech industry or green businesses.
- It should complement Strategic Objective 4 Transport and travel
- There is no mention of what type of jobs should be focused on
- Employment follows infrastructure, not settlement expansion.
- It should be expanded to include an emphasis to positively support local businesses already providing employment in the District.
- There should be reference to the primary and function of the Strategic Road Network and ensuring this is maintained/not prejudiced by planned growth.

### **Strategic Objective SO3: Town centres and rural hinterlands**

- Improving the vitality and viability of town centres should tackle the challenges currently posed by on-line retail offerings
- It should be extended to also refer to key villages providing vital services in rural areas.
- Rural hinterlands should also benefit from investment in facilities of an appropriate scale in order to avoid the need to visit town centres for basic facilities.

### **Strategic Objective SO4: Transport and travel**

- There should be more emphasis on sustainable travel and much less on increasing the capacity of road network; particular focus on public transport in rural areas and raising profile of safe cycle ways
- It fails to complement SO2: Local jobs and economy as the employment strategy is focused on the main M5/A38 routes inaccessible by train
- It should include leading the country in the support for electric vehicles.
- Should seek to reduce CO2 by siting new development close to existing transport hubs and providing additional housing close to employment opportunities where alternatives to car use are available and realistic
- Should include the protection of soils (BMV farmland) as a finite resource and as a way to keep carbon locked up.
- Inclusion of a reference within the 'Economy and Transport' Strategic Objectives to the primary and strategic function of the SRN and ensuring that this is maintained/not prejudiced by planned growth.



### **Strategic Objective SO5: Climate Change and environmental limits**

- It should be made consistent with the Carbon Neutral 2030 commitment and become the over-arching objective in the Emerging Strategy that feeds into all areas of the plan rather than a standalone objective
- It is unambitious and inadequate to talk of mitigation and adaptation in the face of a Climate Emergency. Stronger wording needed to reflect a material commitment to positive measures.
- There should be targets of solar energy on all new development and much of the existing buildings.
- It should go further than Government minimums on building/design and there should be a more pro-active approach to force new developments to adopt green technologies in their construction i.e. higher levels of insulation, adoption of renewable heat solutions i.e. heat pumps.
- More support for design which reduces carbon footprint to meet Stroud Carbon Neutral 2030 goals.
- The requirement for land to be identified for wind, solar and other renewable electricity generation sites is needed to enable SDC to move towards zero carbon and energy security.
- Technology required to minimise waste and seek to recover energy should be explicitly referenced e.g. Anaerobic Digestion.
- The distinct qualities should be made clear so it is known what will be conserved and enhanced
- There should be a commitment to building the resilience of wildlife to climate change through restoring an ecological network.
- Policy should be consistent throughout Gloucestershire on strategic planning matters. There should be a reference to avoiding unnecessary mineral sterilisation and avoiding the occurrence of incompatible development including with important local (minerals and waste) infrastructure
- There should be a commitment to delivering development that meets a recognised standard of excellence for Green Infrastructure
- Support community food-growing projects to provide locally-grown food i.e. not so reliant on importing foodstuffs.
- Garden village concept contradicts this objective

### **Strategic Objective SO6: Our District's distinctive qualities**

- It should explicitly refer to conserving and enhancing the natural beauty and special qualities of the Cotswolds AONB
- It should set aspirations to deliver significant net-gains in biodiversity and establish coherent and resilient ecological networks based on the Lawton principles.
- There should be reference to Green Infrastructure.
- Should be developed further e.g. with bullet points along the lines of Objective 5.
- The garden village concept contradicts this objective



### Council's response

Whilst it is difficult to address all of the detailed points raised in the strategic objectives themselves, which are by definition high level, the Draft Plan addresses many of the points raised, either through the vision, the objectives, the development strategy or in the detailed policies. Specific changes to the strategic objectives include, for homes and communities, promoting quality homes and supporting the elderly and vulnerable. For economy and infrastructure, supporting and recognising existing businesses and encouraging new opportunities and prioritising rather than simply promoting healthy alternatives to the use of the private car. For environment and surroundings, reducing our carbon footprint rather than simply mitigating the effects of climate change and prioritising rather than facilitating the use of sustainable modes of transport.

## The Emerging Growth Strategy

### Qu.4.2a Do you agree with the broad approach of the emerging growth strategy, in terms of distributing the growth required by national policy for Stroud District?

The consultation report published in May 2019 presents the key findings from this question. The report can be viewed in full at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)

### Qu.4.2b Do you support an alternative strategy approach?

A number of responses raised **concerns** about the Emerging Growth Strategy:

- The Emerging Strategy moves away from Options 1 and 3 that were preferred by respondents at the Issues and Options stage, and most resembles Option 4?
- A new town or several small towns existing capacity of services and infrastructure is stretched around larger towns without major investment.
- The rural south of the District is taking a disproportionate amount of the requirement well beyond the scale of the existing communities which will have a significant impact on the road network and may have deliverability issues with competing sites.
- Large scale developments could change the nature and historical character of some of our towns:
- Large scale development in Wisloe and Sharpness is disproportionate to the size of the current settlements and risks destroying the landscape.
- There is a lack of infrastructure in the Sharpness/Newtown area and large number of proposed houses will impact on protected ecological sites. Significant thought is required to make it resilient to flooding. There could be an opportunity for managed strategic retreat in some areas which could provide significant biodiversity gains.
- The strategy does not protect the setting of the Cotswolds AONB. Development on the site at Ganzell Lane, Dursley will erode the buffer and will harm the character of the District.
- The strategy puts too much pressure on Cam and Dursley compared with the much larger settlement of Stroud. Dursley has already taken a huge burden of the District's housing



numbers and there are insufficient services available in Cam and Dursley for this extra population.

Suggestions for **alternative approaches** included:

- The strategy should be revised in line with the 2030 commitment to be carbon neutral
- The strategy should be more flexible taking into account available and deliverable sites. Different settlements have differing potential to accommodate proportionate growth. Some of the larger villages could accommodate useful and positive growth without redefining the overall strategy.
- Prioritise brownfield/derelict land and infill and relax some planning rules to allow incremental, organic growth.
- Options 1 and 2 appear to present the most sustainable options. Consideration should be given to a combination of those sites to provide the bulk of housing development together with a small measure of dispersal (Option 3) to support local needs in the lower tier settlements.
- A more viable option is to concentrate development at already substantial settlements
- Development should be a combination of dispersed development and sensible, balanced development at key sites next to existing employment, services and public transport
- Tier 2 settlements are capable of providing additional development than currently proposed.
- Development should be within the M5/A38 corridor, consistent with the Strategic Economic Plan.
- Consider village expansions along the existing A38 around the villages of Stone, Newport, Slimbridge and Cambridge. Creating a well connected corridor using the existing road infrastructure connecting the residents to employment sites.
- Propose development in the Severn Vale area. Substantial villages like Frampton on Severn, which has good services including a school and employment, and proximity to higher order centres, have the ability to accommodate moderate levels of growth.
- Building near the M5 / A38 gives access to major roads and also the train station at Cam.
- The AONB should not be considered for development, or should have as little as possible.
- The urban expansion of fringe development is encouraged by national policy and there are further opportunities on the edge of Gloucester, with proximity to the motorway network and good access to public transport. It would provide an opportunity for employment in the Gloucester/Cheltenham corridor
- The plan should support smaller developments more widely spread across the District, to retain young people and create opportunities for older people to remain and will have less impact on the environment. It should be done on an equitable basis and in-scale with the existing communities. Adding proportionately to the existing population on a pro-rata basis will support local employment activities which are not based in the main towns.
- Housing growth should not include the small villages in Tier 3b that are located in the AONB and have few facilities or transport links.



#### **Qu.4.2c Have we identified the right towns and villages for growth or do other settlements have growth potential?**

The consultation report published in May 2019 presents the key findings from this question. The report can be viewed in full at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)

#### **Qu.4.2d Do you support our approach to addressing Gloucester's housing needs?**

The consultation report published in May 2019 presents the key findings from this question. The report can be viewed in full at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)

#### **Qu.4.2e Do you support an alternative approach to addressing Gloucester's housing needs?**

A number of responses questioned the need for Stroud to assist in meeting Gloucester's unmet need. Concerns included:

- Letting Gloucester deal with their own needs.
- Stroud should not be included when Tewkesbury and Cheltenham are already helping Gloucester meet its 5 Year Housing Land Supply
- Gloucester should not use Stroud as an additional pool of land when Stroud its own requirement. Stroud needs its land to cater for its own expansion.
- Stroud seems to be going beyond its minimum regulated responsibilities to offer its open spaces to Gloucester.
- Hardwicke and Whaddon sites should not have been identified before the requirement has been confirmed

Suggestions for alternative approaches included:

- The Government re-allocating the need to more suitable places if Gloucester can't meet its own needs
- Other neighbouring authorities should also help i.e. Malvern Hills, Forest of Dean, Cotswold and Wychavon
- There should be a whole county approach to strategic planning.
- Land at Hardwicke and Whaddon should be used to meet our unmet housing need in Stroud District
- Gloucester should firstly utilise the safeguarded land and then examine SALA sites within their own area.
- Gloucester should find the solution by building more densely and upwards rather than sprawling outwards over neighbouring areas.
- Redevelop central Gloucester shopping areas, building more houses in and around the city where there is currently shops and employment.
- Gloucester could expand north towards Highnam.
- Utilise derelict and brownfield land, old empty buildings and empty houses.



- Concentrate on building between Gloucester and Cheltenham, the two main employment centres to maximise the likelihood of the residents finding nearby work thus minimising their transport needs.
- There is scope for further development adjacent to the main roads to the north of Gloucester
- Development should be nearer to Gloucester
- Redevelop Haresfield business park for housing.
- Develop 'new towns' or for rural Gloucestershire, 'new villages' with the essentials of a traditional village - primary school, local shop / post office, village green hall for community activities.
- Develop alongside the A38 from Cambridge to Claypits / or at Stone, Newport, Slimbridge and Cambridge

### Council's response

In response to additional evidence and public comments, the Draft Local Plan includes changes to: confirm our approach to helping to address Gloucester's unmet needs; include more opportunities for organic growth at some of our smaller settlements; and remove potential sites that may have an adverse impact upon the AONB and its setting. However, the broad approach of concentrating growth at the main towns and larger villages and realising the potential for one or two new settlements is the most sustainable approach given the scale of growth required by the Government. Detailed transport modelling of strategic growth locations is underway and whilst sustainable forms of transport will be prioritised, the impacts on the road network will need to be taken into consideration before the Local Plan development strategy can be finalised in 2020.

## Settlement Hierarchy

### Qu.4.3a Are any of the settlements in the wrong tier?

The consultation report published in May 2019 presents the key findings for part of this question. The report can be viewed in full at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)

Specifically cited settlements where respondents proposed changes were:

#### Tier 1

Cam (\*and\*) Dursley  
Cam  
Dursley  
Berkeley  
Wotton Under Edge

#### Tier 3

Brimscombe (\*and\*) Thrupp  
Chalford  
Coaley  
Horsley  
Manor Village  
Newtown & Sharpness  
North Woodchester  
Slimbridge  
Uley

#### Tier 4 and 5

Bussage  
France Lynch  
Nymphsfield



#### **Qu.4.3b Do you support the proposed approach to managing development at small Tier 4 and 5 settlements by including them within the hierarchy and defining Settlement Development Limits?**

The consultation report published in May 2019 presents the key findings from this question. The report can be viewed in full at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)

#### **or do you support an alternative approach of simply treating them as ‘open countryside’?**

Six responses supported treating them as ‘open countryside’; and suggested alternative approaches for managing development in tiers 4 and 5 included:

- Provide greater flexibility by considering each proposal on a case by case basis, which would enable some sustainable development of the lower tier
- Treat all applications on their own merits not just where they are located.
- Each settlement in tiers 4 and 5 should be consulted on whether they could accommodate new housing for their local needs and if there is land available.
- Any development must be in line with a neighbourhood plan or with the support of the community via consultation
- Each settlement should be treated autonomously to maintain rich diverse and distinct identity.

#### **Q.4.3c Do you support the idea that the Local Plan should seek to manage the cumulative impacts of growth on individual settlements?**

The consultation report published in May 2019 presents the key findings from this question. The report can be viewed in full at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)

#### **How should we develop a policy framework to achieve this?**

Suggested for a **Policy Framework** to manage the cumulative impact on growth of individual settlements included:

- New development should be proportionate to the size of existing settlements
- Cap 10% growth of the lower tiers over each 5 year period.
- Build new houses in proportion to the existing settlements
- Develop ratios which relate new housing to existing housing and the thresholds for school and GP provision
- Strict definition of sites that are suitable for development – and those that are not; very clear settlement boundaries; and strict policies to limit infill development, especially in large gardens and open spaces within the settlement.
- The policy framework should encourage settlements to participate in the evaluation of their own settlement to provide a baseline against which future development will be considered. Criteria can then be derived to evaluate the level of impact growth has on a settlement.



- Through Neighbourhood Development Plans, Community Land Trusts, Neighbourhood Development Orders and Parish Councils to avoid imposing the wrong type of development in the wrong place.
- A criterion based policy where the Plan makes positive allocations in mid-tier settlements to provide certainty. This would stop speculative application proposals in different locations, which may come forward ahead of preferred locations.
- Group small settlements in the framework and ensure that development does not destroy the separation between individual settlements.
- Adopt a holistic view of all recent and pending proposals, looking at transport links, schools, medical care etc. and consider the potential impact of other developments in the wider area
- Thought should be given to obvious extensions to current settlement boundaries to provide development in keeping with the real size and nature of each settlement.
- Allowing continued consultation with communities within specified areas to identify what the cumulative impact will be based
- Carry out independent studies by consultants.
- The plan should look at each on a case by case system to consider the impact on the existing community and the suitability of access and the provision of services and facilities
- Look at how many houses are empty there already and use this figure to alter how many are proposed
- Growth should be encouraged and managed as a positive to enhance a community. Any new development should facilitate community growth or enrichment, through public spaces, new facilities, improved transport etc.

### **Council's response**

The Emerging Strategy established that the Council's preferred approach is to retain a settlement hierarchy as a tool for managing growth and development. In response to public consultation, the Draft Local Plan proposes to keep lower tier settlements (described as "Tier 4" and "Tier 5" in the current Local Plan) within the hierarchy and to retain settlement development limits for all settlements. The categorisation of individual settlements into each of the 'tiers' is an evidence-based comparative exercise (Settlement Role and Function Study 2018): the settlements have been objectively assessed, relative to each other. The hierarchy is backed up by other highly detailed policies in the Draft Local Plan, which contain criteria that will determine the suitability of individual infill and windfall sites in the context of individual settlements' constraints and needs. Combining a criteria-based approach with the use of settlement development limits and with an overall strategy (that seeks to prioritise growth and development to the higher tier and more sustainable settlements) allows meaningful scrutiny of individual development proposals, whilst allowing increased flexibility to meet very specific local development needs of individual communities. In particular, responding to local communities' feedback, the Draft Local Plan recognises that some very limited housing development may be justifiable at some lower tier settlements, to ensure they remain viable and accessible communities, and to combat social exclusion. Policies seek to limit the impacts of cumulative growth at small settlements by restricting the number of new dwellings to no more than 10% of the total dwellings existing within the settlement at the start of the Plan period.



## Settlement boundaries

### Qu.4.4a Do you support the emerging strategy's approach towards maintaining settlement development limits?

The consultation report published in May 2019 presents the key findings from this question. The report can be viewed in full at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview) Comments were received through the Emerging Strategy consultation process that detailed support and concerns towards maintaining settlement development limits. These included:

#### Support

- Settlement boundaries are essential to contain development
- Should be maintained in order to preserve the remaining ecological, environmental and landscape of those settlements which have reached or exceeded their natural growth space
- Any currently in place limits for development should remain in place, subject to constant review, and proportionality principles being applied
- Settlement boundaries are critical to providing opportunities for community led housing through the development of Rural Exception Sites

#### Oppose

- The policy is too restrictive and broad. Some sites outside are inherently more suitable to sites inside
- Proposed settlement development limits are too large
- Greater flexibility is required in order for settlements to be able to advance in a sustainable way.
- A case-by-case basis, while taking longer to implement, would ultimately be more beneficial in the long run
- There should be some flexibility in larger tier settlements

### Qu.4.4b Do you support an alternative approach?

Suggestions for alternative approaches included:

- Only allow select exemptions to local people to fulfil a local need
- Settlement development limits can be arbitrary and unduly restrictive. They should be seen as guidelines only.
- Brownfield sites outside settlement development limits could be dealt with on a case-by-case basis but development should remain within settlement boundaries if possible
- Settlement boundaries should be used as a guide only or, alternatively, be drawn more loosely to embrace land for future growth
- Allow extensions to settlement boundaries which are in keeping with the existing size and nature of the settlements
- A landscape based approach should be considered in sustainable settlements



- There should be support for development outside the settlement development limits of tiers 1-3, if the design is outstanding and fulfils enhanced environmental and design criteria.
- There should be adequate consultation with the relevant communities.

#### **Q.4.4c Do you support the proposals to allow some limited development beyond Settlement Development Limits?**

The consultation report published in May 2019 presents the key findings from this question. The report can be viewed in full at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview) Comments were received through the Emerging Strategy consultation process that detailed support and concerns towards allowing limited development beyond settlement development limits. These included:

##### **Support**

- A key criteria should assess the appropriateness of development in terms of scale and availability of services
- Only where there is no direct or indirect impact on designated biodiversity sites or nationally/internationally threatened wildlife, and where the development delivers a net gain for biodiversity and the ecological network
- This seems the most sympathetic to the needs of the communities
- Only if strictly controlled and for local people who are self-building
- Support for a more flexible approach in tiers 1-3 with stricter controls for tier 4-5
- Developments should be at least 50 percent affordable
- It should be limited to small developments associated with existing development
- Only allow exemptions for high-quality self-built eco-homes, or small scale affordable eco-homes, if put forward by Neighbourhood Development Plans at all Tiers.

##### **Oppose**

- All development should be kept within the boundary limits by using all brownfield sites
- It will set a precedent
- Once countryside is removed it is gone forever.
- The wording 'limited development' is too weak and needs to be carefully defined.

##### **General comment**

- Once settlement development limits are extended development will start creeping
- Development should only be considered where it is needed and supported by a Neighbourhood Development Plan or Village Design Statement.

#### **Qu.4.4 d or do you have an alternative approach?**

Suggestions for alternative approaches included:

- A well connected village corridor along the A38 in the villages of Stone, Newport, Slimbridge and Cambridge.



- Only allow development outside settlement boundaries if locally supported in tier 4 and tier 5 settlements
- Development should only be considered where needed and supported by a Neighbourhood Development Plan or Village Design Statement
- Sites outside the settlement boundary should only be considered with local Parish and Town Council support and should be made to go above and beyond the normal design, environmental and energy standards
- A much more organic approach to infill and small scale developments based on demand to move to an area or for existing communities to grow and house future generations

**Qu.4.4e Do you support the specific changes to existing Settlement Development Limits that are set out in Appendix A?**

The consultation report published in May 2019 presents the key findings from part of this question. The report can be viewed in full at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview) Comments were received through the Emerging Strategy consultation process that raised concern with the following changes proposed:

**SDL-DUR01 at Shearing Close, Littlecombe**

- Express concern about the visual impact of the Littlecombe development on the area.

**SDL-HOR01 Sealey Wood Lane**

- The development is out of scale with the existing settlement and should not expand further.

**SDL-LEO01 Lyndon Morgan Way**

- The settlement boundary should only include the Saxon Gate development and not the whole of Mankley Field
- The undeveloped area of Mankley Field should remain outside Leonard Stanley Settlement Development Limits.

**SDL-MIS01 Miserden**

- The proposed settlement development limit includes largish areas of green fields.
- The area identified seems disproportionate to the size of the settlement.
- It has been drawn too tightly around the southern edge of the settlement and should include the Estate nursery (horticultural), gardens, and garden cafe, biomass boiler house, and associated grounds.

**SDL-STN01 Vale Orchard**

- The area identified is reserved as a green space, SUDs pond and wildlife mitigation area as part of an adjoining development and should not be included within the settlement development limit.

**SDL-STO01 Brunel Way/ Oldends Lane**

- The area identified seems disproportionate to the size of the settlement.



#### **Qu.4.4f Do you support any other changes to Settlement Development Limits, not listed in Appendix A?**

The following additional changes to settlement development limits were suggested (changes listed alphabetically by settlement):

- All settlement development limits should be reviewed to allow for proportional growth.
- There should be a wider review of Berkeley Settlement Development Limit to reflect extant planning permissions and the implications of proposed allocations.
- Include Mugswell Nursery, Hayhedge Lane within Bisley Settlement Development Limit
- Amend Cam Settlement Development Limit at Woodend Lane, Cam.
- Include a modest area for future growth north of the doctors' surgery on Whitminster Lane within Frampton on Severn Settlement Development Limit.
- Include Emerging Strategy Paper site G1 South of Hardwicke within Hardwicke Settlement Development Limit.
- Include SALA site HAR005 Land East of Waterwells Business Park within settlement development limits.
- Consider a settlement development limit at Harescombe.
- Include the domestic garden of Manor Farm Horsley within Horsley Settlement Development Limit.
- Include the full residential curtilage of Barley Cottage, Boscombe Lane, Horsley within Horsley Settlement Development Limit.
- Include the small enclave in Tetbury Street based upon the Woefulthane yard and adjacent house, next to the recently completed development by Partridge Homes, within Minchinhampton Settlement Development Limit.
- Include Miserden nursery, gardens, cafe and associated grounds within an alternative settlement development limit boundary at Miserden.
- Include SALA site NAI007 Land adjacent to Lower Newmarket Road within Nailsworth Settlement Development Limit.
- Include Emerging Strategy Paper site PS08 North of Avening Road, Spring Mill Industrial Estate, the King George V Playing Fields and SALA site NAI0003 Land at Avening Road within Nailsworth Settlement Development Limit.
- Include SALA site PAI007 Land at Stamages within Painswick Settlement Development Limit.
- Include Emerging Strategy Paper site PS17 Magpies site and car park, Oldends Lane within Stonehouse Settlement Development Limit.
- Include SALA site STO012 Land north of The Glen, Woodcock Lane within Stonehouse Settlement Development Limit.
- Include planning permission site S.18/0982/FUL west of railway line at Oldends Lane within Stonehouse Settlement Development Limit.
- Include West of Stonehouse Local Plan allocation within Stonehouse Settlement Development Limit.



- Include SALA site STR056 Land west of Devereaux Crescent within Stroud Settlement Development Limit.
- Include the existing commercial and residential uses on the south side of the A419 within Thrupp Settlement Development Limit.

### Council's response

The Draft Plan as a whole does seek to provide more opportunities and flexibility for development proposals that do not conflict with or prejudice the Plan Strategy and broad sustainability and environmental protection considerations. The Council has undertaken a review of individual settlement development limits and the recommendations form part of the Draft Plan proposed changes.

The Draft Plan will enable opportunities for strategic planned growth at our larger towns as well as some organic growth at our smaller settlements. This revised approach responds to consultation responses for more flexibility but recognises that settlement development limits are a well established planning tool with broad support and environmental and sustainability benefits.

The Draft Plan seeks to address some of the specific concerns expressed in the last consultation regarding flexibility and development opportunity. Settlement development limits will continue to be weighed with other policies and material considerations on a case by case basis. The Council will also recognise identified and agreed local community social, economic and/or environmental needs and priorities. In all cases, such development opportunities will be controlled and will need to be compliant with the broad Draft Plan Strategy approach and the policies that accompany it.

## Mini visions and priorities

### Qu.5.0a Do you support the proposed mini-visions for your area(s)?

The consultation report published in May 2019 presents the key findings from this question. The report can be viewed in full at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)

### Qu.5.0b Would you like to propose alternative wording for any of the mini-visions?

Suggestions for inclusion in the mini-vision for the future of the **Stroud Valleys**:

- Highlighting the Cotswolds AONB as a place where the distinctive beauty of the landscape and built heritage is conserved, enhanced and enjoyed by both visitors and all those who live and work there.
- Highlighting the special qualities of the wildlife-rich unimproved limestone grasslands and ancient woodlands as an integral part of the character of the Stroud Valleys.
- Highlighting the creative potential of craftspeople in Stroud to design and build ecologically sensitive housing



Suggestions for inclusion in the mini-vision for the future of the **Stonehouse Cluster**:

- Highlighting the Cotswolds AONB as a place where the distinctive beauty of the landscape and built heritage is conserved, enhanced and enjoyed by both visitors and all those who live and work there.
- Highlighting the potential of the Cotswold Way through Kings Stanley and close to Stonehouse.
- Supporting the contribution of established local businesses across the wider cluster area.
- Maintaining the distinct identity and strong sense of community of villages and hamlets at Eastington.

Suggestions for inclusion in the mini-vision for the future of the **Cam and Dursley Cluster**

- Highlighting the Cotswolds AONB as a place where the distinctive beauty of the landscape and built heritage is conserved, enhanced and enjoyed by both visitors and all those who live and work there.
- Highlighting the valued landscape setting and wildlife rich environment of Dursley surrounded by the Cotswolds AONB and ancient beech woodlands.
- Acknowledging Cam and Dursley as distinct settlements.
- Raising the tourism profile of the cluster and as a destination for walkers.

Suggestions for inclusion in the mini-vision for the future of the **Berkeley Cluster**

- Protection for the rural lifestyle, culture and ecology of the countryside and Severn Estuary around the historic town of Berkeley
- Maintaining the natural beauty of the countryside to develop tourist and visitor potential.
- Maintaining the distinct identity and strong sense of community of villages and hamlets surrounding Sharpness at Newtown, Halmore, Wanswell, Brookend, Pitbrook and Abwell, and at Slimbridge; Gossington, Moorend and Breadstone.
- Highlighting the potential of the A38 as a sustainable public transport corridor connecting Stone, Newport, Slimbridge and Cambridge.

Suggestions for inclusion in the mini-vision for the future of the **Wotton Cluster**

- Highlighting the Cotswolds AONB as a place where the distinctive beauty of the landscape and built heritage is conserved, enhanced and enjoyed by both visitors and all those who live and work there.
- Boosting housing supply and delivering new homes, including affordable homes, in response to local need.
- Amend range of shops and services to remove reference to agricultural market and include heritage centre, arts centre and Wotton Community Sports Foundation facilities at KLB

Suggestions for inclusion in the mini-vision for the future of the **Cotswold cluster**

- Highlighting the role of rural businesses in providing local employment opportunities.



### **Qu.5.0c Do you support the identified key issues and priorities for action for your area(s)?**

The consultation report published in May 2019 presents the key findings from this question. The report can be viewed in full at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)

### **Qu.5.0d Are there other important issues and priorities you would like to highlight**

A number of other important issues and priorities for the eight clusters were raised through the consultation responses. They included:

#### **Stroud Valleys:**

- Conserving and enhancing the natural beauty of the Cotswolds AONB
- Encouraging solar panels and electric vehicle charging points in new development
- Requiring passivehaus standard for all new houses
- Protection for the Commons as areas of special scientific interest.
- Improving the vitality of town centres
- Improved public open space provision and accessibility
- Include housing as an objective

#### **Stonehouse Cluster:**

- Conserving and enhancing the natural beauty of the Cotswolds AONB and its setting
- Improving pedestrian and cycling connections to Stonehouse High Street

#### **Cam and Dursley:**

- Conserving and enhancing the natural beauty of the Cotswolds AONB
- Increasing health and community facilities in Cam
- Easing traffic congestion in Dursley and making the pavements safer.
- Protecting the historic character of Cam and Dursley
- Maximising active travel links to sustainable transport infrastructure serving Cam and Dursley station. Include a safe cycle route from Cam & Dursley to the canal and Wildfowl and Wetlands Trust, linking to the station.
- Providing for children and young people
- Include housing as an objective

#### **Gloucester Fringe:**

- Conserving and enhancing the natural beauty of the Cotswolds AONB
- Delivering a new train station and sustainable transport hub at Hunts Grove with public transport, pedestrian and cycle links.
- Addressing traffic congestion A38 Cole Avenue to St Barnabas corridor
- Connecting employment allocation sites to footway and cycle infrastructure
- Ensuring walking routes are clearly defined, attractive and suitable for all users.



- Identify Javelin Park EfW as a stimulus for complementary innovative business and combined heat and power opportunities

#### **Berkeley Cluster:**

- Protecting the natural landscape and wildlife habitats
- Protecting the foreshore Severnway from Sharpness to Berkeley Pill
- Completing the Berkeley Link Road to the A38
- Safe walking and cycling routes to the Wildfowl and Wetlands Trust at Slimbridge linked to Cam and Dursley station
- Safe walking and cycling routes from Newport to Berkeley extended to Sharpness and the Gloucestershire Science and Technology Park
- Provision of a well signposted, direct walking/ cycle link from Wisloe to Cam and Dursley station linked to a wider network of clearly defined, attractive pedestrian and cycling routes.
- Identifying Sharpness and Newtown as a potential exemplar eco-town
- Restoration of the heritage railway

#### **Wotton Cluster:**

- Conserving and enhancing the natural beauty of the Cotswolds AONB
- Provision of additional off-street car parking and coach parking
- Reducing traffic congestion in Wotton under Edge and improving traffic flow through town
- Improving public transport linked to a re-opened Charfield station
- Delivering a safe, traffic-free Greenway to connect Wotton under Edge, Kingswood and Charfield including links to Renishaw New Mills, KLB School and Wotton Community Sports Foundation facilities
- Promoting Wotton under Edge as a tourist destination

#### **Cotswold Cluster**

- Conserving and enhancing the natural beauty of the Cotswolds AONB
- Improvements to IT connectivity and infrastructure to support home working
- Protection of the historic environment, specifically including archaeology and key open spaces within historic settlements
- Ensuring adequate provision of smaller properties to allow for starter homes and opportunities for downsizing for local people

Wildlife protection and enhancement was identified as relevant to all of the Parish clusters.

#### **Council's response**

The breadth and depth of comments on the local mini-visions and priorities is particularly welcomed and will be reflected in the final Local Plan in 2020, when the Cluster sections will be expanded. At this stage, the Draft Plan now reflects in the mini-visions communities' prioritisation of the Cotswolds AONB and includes additional key local features and characteristics identified as contributing to the distinctiveness of parish cluster areas. The



identified key issues and priorities reflect the top key concern for the protection of finite natural landscape, environmental and historic resources and the need to embrace green technologies and provide sustainable transport infrastructure and choices alongside specific community housing and employment priorities.

## 3. Potential sites and alternatives

The Emerging Strategy document identified potential sites for development and the Council asked people whether the highlighted sites were the most sustainable for growth or whether other alternatives were suitable. This section looks at the physical constraints, potential impacts and opportunities identified in consultation responses for each of the potential sites. A Council response is also given for each site.

### The Stroud Valleys - Brimscombe & Thrupp

#### PS01 Brimscombe Mill

##### Physical constraints

- Increased pressure on local infrastructure from increase in local population

##### Potential impacts

- Impact on wildlife using the canal corridor, particularly bats

##### Opportunities

- Brownfield site redevelopment
- Canal redevelopment and access

#### Council's response

The site, allocated in the adopted Local Plan, provides opportunities to regenerate brownfield land, facilitate the restoration of the canal and deliver housing in a relatively sustainable location. However, it is recognised that any redevelopment will need to reflect environmental constraints including any impact on wildlife using the canal corridor. Detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

#### PS02 Brimscombe Port

##### Physical constraints

- Increased pressure on local infrastructure from increase in local population

##### Potential impacts

- Impact on wildlife using the canal corridor, particularly bats



### **Opportunities**

- Brownfield site redevelopment
- Canal redevelopment and access

### **Council's response**

The site, allocated in the adopted Local Plan, provides opportunities to regenerate brownfield land, facilitate the restoration of the canal and deliver housing in a relatively sustainable location. However, it is recognised that any redevelopment will need to reflect environmental constraints including any impact on wildlife using the canal corridor. Detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## **PS03 Land at Hope Mill**

### **Physical constraints**

- Increased pressure on local infrastructure from increase in local population

### **Potential impacts**

- Impact on wildlife using the canal corridor, particularly bats

### **Opportunities**

- Brownfield site redevelopment
- Canal redevelopment and access

### **Council's response**

Whilst the initial site assessment work identified this site as having development potential, the site is not being actively promoted and has significant contaminated land challenges. Consequently, at this stage, it cannot be demonstrated that the site is deliverable and, pending further information, the site has therefore been removed from the list of allocated sites.

## **The Stroud Valleys - Minchinhampton**

### **PS04 South of Cirencester Road**

### **Physical constraints**

- Access route through the commons is unsuitable for additional traffic

### **Potential impacts**

- Amenity use impact on nearby designated sites such as Rodborough Common
- Impact on Cotswolds AONB and its setting
- Increased traffic generation and impact on the commons
- Loss of greenfield site

### **Opportunities**

- Opportunity for enhanced bus timetabling to connect Minchinhampton to Stroud and Cirencester



### **Council's response**

Comments received and further assessment work has identified landscape and visual concerns regarding self build and custom build development at this location within the AONB directly adjacent to, and highly visible from, a well used road and entrance to Minchinhampton. At this stage, pending further review, it is considered that there are better locations within the settlement to accommodate development and better ways of addressing identified local needs.

## **PS05 East of Tobacconist Road**

### **Physical constraints**

- Access route through the commons is unsuitable for additional traffic
- Access route between 2 residential properties could reveal ownership/access issues

### **Potential impacts**

- Amenity use impact on nearby designated sites such as Rodborough Common
- Impact on Cotswolds AONB and its setting
- Increased traffic generation and impact on the commons
- Loss of greenfield site
- Adjacent to an Ancient Monument

### **Opportunities**

- Opportunity for enhanced bus timetabling to connect Minchinhampton to Stroud and Cirencester

### **Council's response**

The site is considered one of the best opportunities at Minchinhampton to meet identified local needs whilst minimising landscape impact. The scale of potential development has been reduced to reflect concerns regarding major development within the AONB. The need for strategic landscaping, to address proximity to an ancient monument and to minimise traffic impact is recognised and detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## **The Stroud Valleys - Nailsworth**

### **PS06 New Lawn, Nailsworth**

### **Physical constraints**

- No comments received

### **Potential impacts**

- Loss of community facility and open space
- Increased traffic



### **Opportunities**

- Improvements to local infrastructure and links from Forest Green to Nailsworth
- Delivery of improved green infrastructure

### **Council's response**

Subject to the satisfactory relocation of Forest Green football club, the site is considered suitable for redevelopment to meet the needs of Nailsworth. The need for community and open space is recognised and referred to in the Draft Local Plan and detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## **PS07 North of Nympsfield Road/Nortonwood Junction**

### **Physical constraints**

- No comments received

### **Potential impacts**

- Cumulative impact of this and development of New Lawn site
- Setting of Cotswolds AONB

### **Opportunities**

- Combined with PS06 to deliver coordinated enhancement of Forest Green
- Provision of green infrastructure and public open space

### **Council's response**

Together with the adjoining New Lawn site, the site offers the potential to meet identified local needs whilst minimising landscape impact. Additional landscape assessment work has identified ways of mitigating any adverse landscape impacts and detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## **PS08 North of Avening Road**

### **Physical constraints**

- No comments received

### **Potential impacts**

- No comments received

### **Opportunities**

- Remain as an employment site/garden centre

### **Council's response**

The site was originally promoted as having potential for redevelopment for employment uses. However, the site has now been bought and subject to new investment and continues to operate as a Garden Centre. This is considered to be an effective use of this site and there is no evidence



of deliverability for wider employment uses. On this basis, the site has been removed as a potential site for redevelopment for employment uses.

## The Stroud Valleys – North Woodchester

### PS09 Rooksmoor Mill

#### Physical constraints

- No comments received

#### Potential impacts

- Impact upon Nailsworth Brook Local Wildlife Site

#### Opportunities

- Improve an untidy brownfield site

#### Council's response

The site has received planning permission and is now under construction for housing and employment uses. The site will support the role of North Woodchester within the development strategy for the Plan period.

## The Stroud Valleys - Stroud

### PS10 Railway land/ car parks, Cheapside

#### Physical constraints

- No comments received

#### Potential impacts

- Loss of town centre parking
- Impact on neighbouring heritage assets (station, goods shed, Hill Paul)

#### Opportunities

- Brownfield development
- Canalside improvements
- Cycling and walking improvements linking to the station

#### Council's response

The opportunities for making beneficial use of brownfield land and for improving linkages between the canal corridor and the town centre are recognised. However, it will be important to ensure that any development does not undermine the current use of the site for town centre uses. Further work is required to ensure that the site is deliverable. Detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.



## PS11 Merrywalks Arches, Merrywalks

### Physical constraints

- Within Flood Zone 3

### Potential impacts

- No comments received

### Opportunities

- Brownfield development

### Council's response

The opportunities for making beneficial use of brownfield land for housing and environmental improvement are recognised. Any flood risk issues will need to be taken into account and further work is required to ensure that the site is deliverable. Detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## PS12 Police Station/Magistrates Court, Parliament Street

### Physical constraints

- No comments received

### Potential impacts

- Loss of town centre parking

### Opportunities

- Brownfield development

### Council's response

Proposals for redevelopment of this brownfield site for housing and open space uses are under active consideration. However, impacts upon the town centre, both in terms of uses and in terms of heritage sensitivities, will need to be taken into account. Detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## PS13 Central river/ canal corridor

### Physical constraints

- Located in Flood Zone 3

### Potential impacts

- Impact on Key Wildlife Site and green meadow areas
- Impact on conservation area
- Loss of outdoor play space



### **Opportunities**

- Opportunity for enhancement of the canal
- Brownfield development
- Good town centre access and close to strategic transport infrastructure
- Opportunities for sustainable transport, cycling and walking

### **Council's response**

It is recognised that there are multiple constraints relating to the river and canal corridor within Stroud. However, there are also significant opportunities in terms of making more active and efficient use of land, regenerating historic assets and delivering housing and open spaces in a sustainable location. There is active support among some landowners for regeneration but further work is required on land assembly and constraints to ensure that opportunities are deliverable. Detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## **The Stonehouse Cluster – Kings Stanley**

### **PS14 Stanley Mills**

#### **Physical constraints**

- No comments received

#### **Potential impacts**

- No comments received

#### **Opportunities**

- No comments received

### **Council's response**

The site has received planning permission and is now under construction for housing and employment uses. Challenges remain and further work is required to ensure that the site can be delivered in full. Subject to this, the site will support the role of Kings Stanley within the development strategy for the Plan period.

### **PS15 North of Kings Stanley Primary School**

#### **Physical constraints**

- No comments received

#### **Potential impacts**

- Local wildlife sites and River Frome catchment
- Increased pressure on school capacity
- Additional traffic on unsafe roads for walkers, cyclists and horse riders
- Increased traffic in proximity to primary school



- Physical impact on the feel of the primary school

#### **Opportunities**

- Existing sustainable transport links to Stonehouse and Stroud

#### **Council's response**

Whilst initial assessment identified this site as having potential for a small residential development, it is recognised that the site has poor access and could result in conflict with the adjacent primary school. Unless these matters can be resolved, it is considered that the role of Kings Stanley within the development strategy is better addressed through the committed scheme at Stanley Mills, subject to its delivery being confirmed.

## The Stonehouse Cluster – Leonard Stanley

### **PS16 South of Leonard Stanley Primary School**

#### **Physical constraints**

- No comments received

#### **Potential impacts**

- Increased pressure on oversubscribed school
- Increased traffic on surrounding road network
- Loss of potential land for school expansion

#### **Opportunities**

- Sustainable location served by local services and facilities

#### **Council's response**

Further assessment work has identified that a small part of the site may be required in the future to ensure that the primary school can be expanded, if required. Subject to the satisfactory resolution of this issue with the County Council, the remaining part of the site is considered suitable for a slightly reduced housing scheme. Detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## The Stonehouse Cluster – Stonehouse

### **PS17 Magpies site, Oldends Lane**

#### **Physical constraints**

- No comments received

#### **Potential impacts**

- No comments received



### **Opportunities**

- Brownfield development

### **Council's response**

The Open Space, Green Infrastructure, Sport and Recreation Study has recommended that improvements to the Oldends Lane community and open space facilities should be progressed and this small development offers the opportunity to deliver these improvements. Wording has been added to ensure that any layout does not prejudice the future delivery of a pedestrian and cycle bridge across the railway. Detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## **PS18 Land to rear of Regent Street**

### **Physical constraints**

- Access and parking on Regent Street

### **Potential impacts**

- No comments received

### **Opportunities**

- No comments received

### **Council's response**

The owners of this site have confirmed that the site is not available for development and, on this basis, the site has been removed as a potential allocation.

## **PS19 North/northwest Stonehouse**

### **Physical constraints**

- The site is distant from the towns facilities
- It is not large enough to deliver infrastructure

### **Potential impacts**

- Site will negatively impact on Hardwicke and surrounding country areas
- Increase in traffic on rural road B4008
- Harm to setting of the Cotswolds AONB
- Views from Stonehouse

### **Opportunities**

- Sustainable transport links to Stonehouse. Stagholt Lane could become a pedestrian and cycle track



### **Council's response**

Concerns regarding the impact of PS19b on the setting of the AONB are acknowledged and, on this basis, the site has been removed from the Draft Local Plan. Further landscape assessment work has confirmed that any visual impact of PS19a west of the railway could be softened and integrated by appropriate planting particularly along the northern and north-eastern boundary. The site offers the opportunity to develop a planned urban extension, linking through to Great Oldbury and the planned local centre there and the provision of an additional primary school. The site will be subject to transport modelling and detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## **PS20 M5 Junction 13**

### **Physical constraints**

- Partly in Flood Zone 3

### **Potential impacts**

- Traffic impacts
- Encourage commuting
- Harm to conservation area
- Harm to landscape and biodiversity
- Disjointed from existing built up areas
- Loss of existing green space

### **Opportunities**

- Vicinity to motorway provides good transport links

### **Council's response**

The southern part of the site is partly within the floodplain and the Industrial Heritage Conservation Area and any development needs to fully recognise and respond to these constraints. However, there remains potential for a stadium, employment provision and community and open space uses across the wider site and for a new cut for the canal to facilitate reconnection with the wider canal network at Saul. The site will be subject to transport modelling and detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## **Cam & Dursley – Cam**

### **PS21 Land adjacent to Tiltdown House**

### **Physical constraints**

- Concern around access on to Tiltdown

### **Potential impacts**

- Adverse impact on heritage setting of Grade II Tiltdown House
- Loss of green space



### **Opportunities**

- Provision of outdoor play space
- Links to Cam and Dursley Station
- Access to Dursley - Uley Greenway

### **Council's response**

The primary constraints relating to this site are heritage impact on Tilsdown House and identifying a suitable and safe access to the site. The Draft Plan identifies the lower northern portion of the site as suitable for residential development, to protect the setting of the listed Tilsdown House. Detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## **PS22 Coaley Junction**

### **Physical constraints**

- No comments received

### **Potential impacts**

- Area already overdeveloped
- Loss of Greenfield affecting the rural approach to Cam
- Loss of an area with potential for train station improvements

### **Opportunities**

- Near to transport links
- Away from AONB

### **Council's response**

The site has now received planning permission and has been removed as a potential allocation from the Draft Local Plan.

## **PS23 Rear of 4-60 Draycott**

### **Physical constraints**

- Medium sewerage risk (EA)

### **Potential impacts**

- No comments received

### **Opportunities**

- Retain existing businesses and accommodate small and growing businesses
- Infrastructure improvements



### **Council's response**

The site is partly in active use, is in multiple ownership and is not being actively promoted. Consequently, the site is not considered deliverable and has been removed as a potential employment allocation in the Draft Local Plan.

## **PS24 West of Draycott**

### **Physical constraints**

- Sewerage and surface water constraints

### **Potential impacts**

- Impacts on Cams rural identity and risk of merging with Wisloe
- Strain upon network and services
- Loss of Greenfield site

### **Opportunities**

- Good proximity to M5, A38 and Cam and Dursley Station
- Much needed outdoor play space provision

### **Council's response**

The site has the potential to meet housing needs within a land parcel with less landscape sensitivity than other areas around Cam and provide good links to Cam centre and the railway station. The provision of a primary school and open space on-site adjacent to Jubilee Fields together with improved access to these facilities will benefit the local network and local services. Strategic landscaping along northern and western boundaries and a layout which keeps development below the skyline will be important to minimise local visual and amenity impacts and retain a sense of local identity. The site will be subject to transport modelling and detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## **PS25 East of River Cam**

### **Physical constraints**

- In the River Cam flood plain
- Access required from neighbouring allocated site

### **Potential impacts**

- Landscape impact of development along River Cam

### **Opportunities**

- Close to transport links
- Open space provision along the river
- Potential cycle route for Dursley to Uley Greenway



### **Council's response**

The site has the potential to facilitate better access between Cam local centre and the allocated site North East Cam and complete the cycle link along the disused railway line. The constraints relating to landscape and local flood risk are acknowledged and reduce the potential from the area in the vicinity of the site. A modest “rounding off” of the existing allocation, linking to Cam local centre is considered appropriate. Detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## **Cam & Dursley – Dursley**

### **PS26 Land off Acacia Drive / Oak Drive, Kingshill**

#### **Physical constraints**

- No comments received

#### **Potential impacts**

- No comments received

#### **Opportunities**

- No comments received

### **Council's response**

The site may have some potential for a limited development, but this is likely to be below the threshold for an allocated site. Any development will contribute to the supply from windfall development, for which an allowance is made in the Draft Local Plan.

### **PS27 1-25 Long Street**

#### **Physical constraints**

- No comments received

#### **Potential impacts**

- No comments received

#### **Opportunities**

- No comments received

### **Council's response**

The site has potential to provide further town centre facilities and environmental improvements subject to the resolution of local servicing and parking provision and ensuring any development is in keeping with the Conservation Area.



## PS28 The Old Dairy / Land off Prospect Place

### Physical constraints

- Narrow access via May Lane

### Potential impacts

- No comments received

### Opportunities

- No comments received

### Council's response

The site is being actively considered for partial redevelopment to provide for some housing, open space and town centre uses. The narrow access via May Lane is acknowledged and any scheme will need to take into account this constraint as well as the local character of this area adjoining the Conservation Area and listed buildings.

## PS29 North of Ganzell Lane

### Physical constraints

- No comments received

### Potential impacts

- Increased traffic in an area already subject to congestion
- Impact on the setting of the Cotswolds AONB
- Loss of useable agricultural land
- Loss of open fields for amenity use (walking)

### Opportunities

- Public open space/play space provision

### Council's response

Further landscape assessment has identified that it may be possible to carefully site new development to avoid significant impacts upon the setting of the AONB. However, concerns remain that development may be apparent from some locations within the AONB and on balance it is not considered that the provision of 80 new homes would be of sufficient positive benefit to outweigh the potential harm from development close to the edge of the AONB, particularly as other locations at Cam away from the AONB are available to meet the needs of the local area and the District



# The Gloucester Fringe – Hardwicke

## PS30 Hunts Grove extension

### Physical constraints

- No comments received

### Potential impacts

- Increased pressure on road network capacity
- Increased pressure on infrastructure and services e.g. school, sewers
- Increased usage of canal towpath

### Opportunities

- Good access for employment
- Improved transport links to Gloucester
- Improved flood risk management
- Walking and cycling links

### Council's response

The site is allocated in the adopted Local Plan and provides the opportunity to complete the Hunts Grove development. Additional highway infrastructure including development of the main access from the A38 is due to commence shortly, which will provide additional highway capacity to the site. The development will also provide an additional primary school and open space. Detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## PS31 Quedgeley East

### Physical constraints

- No comments received

### Potential impacts

- Increased pressure on M5 motorway junction 12
- Loss of greenfield site

### Opportunities

- No comments received

### Council's response

The site has now received planning permission and has been removed as a potential allocation from the Draft Local Plan.



## PS32 South of M5 / J12

### Physical constraints

- No comments received

### Potential impacts

- Increased congestion on local road network

### Opportunities

- Sustainable location for strategic development

### Council's response

The site has potential as an extension to employment provision at Quedgeley East, subject to strategic landscaping to the south east to protect the setting of Haresfield. Transport modelling is currently investigating capacity issues on the road network and any mitigation measures will feature in the final Local Plan. Detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## G1 South of Hardwicke

### Physical constraints

- No comments received

### Potential impacts

- Insufficient infrastructure to support the development
- Impact on remaining rural character of area
- Impact on heritage character and setting of Hardwicke
- Increased traffic congestion in the area
- Contrary to Hardwicke NDP

### Opportunities

- Sustainable location near to Gloucester
- Additional retail, open space and educational uses
- Improved transport infrastructure linking to Gloucester and Stroud

### Council's response

Recent assessment work has highlighted the functional relationship of land within this location to Gloucester. A previous JCS Inspector commented on the site having potential to meet Gloucester's future needs. Compared with other locations on the Gloucester fringe, the site retains cultural heritage sensitivities associated with the historic settlement of Hardwicke and listed buildings within the area which may limit development potential. However, the site performs better in terms of landscape sensitivity compared to some other sites on the fringe. On balance, at this stage, land at Whaddon is preferable as a strategic location to contribute to meeting Gloucester's future needs due to the size of the site, the potential to accommodate a new secondary school and the lack of any functional links to tiered settlements within Stroud.



Further consideration will, however, be given to the justification to meet Gloucester's needs at this location in consultation with Gloucester City and other neighbouring authorities.

At Environment Committee on 24 October 2019 it was decided that the site may have potential to contribute towards future housing needs and so will be included within the Draft Local Plan for the purposes of public consultation during Autumn/Winter 2019/20.

## The Gloucester Fringe – Whaddon

### G2 Land at Whaddon

#### Physical constraints

- Within a floodplain

#### Potential impacts

- Coalescence with Gloucester leading to loss of identity
- Too many houses with little room for outdoor space and green infrastructure
- Increased pressure on local infrastructure and already congested road network
- Impact upon existing village/rural character
- Visual impact on views from Robinswood Hill and country park
- Increased pressure on M5 Junction 12
- Loss of green fields/ agricultural land
- Impact on Cotswolds AONB setting

#### Opportunities

- Sustainable location served by Gloucester
- Improved transport infrastructure linking to Gloucester and Stroud
- Improved flood risk benefits as part of development

#### Council's response

Recent assessment work has highlighted the functional relationship of land within this location to Gloucester. A previous JCS Inspector commented on the site having potential to meet Gloucester's future needs. Compared with other locations on the Gloucester fringe, the site performs relatively well, although the landscape is identified as having a medium-high sensitivity to housing. On balance, at this stage, land at Whaddon is preferable as a strategic location to contribute to meeting Gloucester's future needs due to the size of the site, the potential to accommodate a new secondary school and the lack of any functional links to tiered settlements within Stroud. The site will be subject to transport modelling and detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.



## The Berkeley Cluster – Berkeley

### PS33 Northwest of Berkeley

#### Physical constraints

- Within floodplain

#### Potential impacts

- Impact of congestion on already poor road network
- Berkeley has already seen extensive development without investment in infrastructure
- Coalescence with proposed Sharpness development
- Loss of identity of Berkeley due to large scale housing development
- Lack of existing facilities
- Increased pressure on oversubscribed education facilities
- Loss of useable farmland
- Lack of local employment opportunities leading to increased car commuting

#### Opportunities

- New health facilities
- Proportionate extension to town aiding prosperity

#### Council's response

As a tier 2 settlement, Berkeley is an appropriate location for further development and the site performs well compared against alternatives. Detailed masterplanning can address the floodplain issue which is restricted to a part of the site identified as open space. Coalescence with Sharpness development will be avoided. Education issues will be investigated further. Subject to satisfactory resolution, detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## The Berkeley Cluster – Newtown & Sharpness

### PS34 Sharpness Docks

#### Physical constraints

- Access from Oldminster Road which already suffers from congestion

#### Potential impacts

- Industrial working dock not ideal for neighbouring residential development
- Impact on heritage
- Impact on local wildlife including along the canal and river.
- Lack of local employment

#### Opportunities

- Regeneration of the docks and surrounding landscape
- Brown field areas and not in or near an AONB.



- Easy access for commuters.
- Great opportunity to regenerate the area.
- There are good roads in the Sharpness and Berkeley area
- The site would benefit from proportionate development, landscaping and regeneration.
- Would help positively open up opportunities for tourism within the area

#### **Council's response**

The site is allocated in the adopted Local Plan and a planning application is currently being considered. If this is approved before the final Local Plan is approved, the site will be removed as an allocation and will contribute to the housing supply as an existing commitment.

### **PS35 Land at Focus School, Wanswell**

#### **Physical constraints**

- Concerns about narrow roads and on street parking

#### **Potential impacts**

- Lose opportunity for secondary school/playing field/ community uses
- Isolated location

#### **Opportunities**

- Brownfield development
- New education and health facilities

#### **Council's response**

The current education providers on site have stated their intentions to vacate the site. The buildings are in need of substantial repair or redevelopment. Redevelopment for housing would provide the opportunity to retain and enhance existing playing fields and open space as part of the overall strategy for future community provision at a Sharpness new settlement. Redevelopment for housing offers the potential to improve parking provision in the local area. Detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

### **PS36 South and east of Newtown and Sharpness**

#### **Physical constraints**

- Only 1 road into and out of the area

#### **Potential impacts**

- Lack of existing services to serve large development (schools, health service etc)
- Transport infrastructure is not suitable
- Lack of local employment leading to extra car journeys
- Loss of existing "village feel"
- Loss of open countryside and greenfield land
- Ecological impact on Severn Estuary SAC and SSSI sites



- Loss of agricultural land
- Coalescence of existing villages
- Disproportionate amount of development for the area and out of scale

### **Opportunities**

- Some brownfield development and regeneration
- Provision of needed local facilities
- Potential for new rail and cycle links
- Opportunity for an exemplar development with new facilities and infrastructure

### **Council's response**

Development of a new settlement at Sharpness provides the opportunity to address many of the issues identified in terms of lack of local facilities which piecemeal development could not provide. The new development will provide local centre facilities including retail and community provision as well as secondary and primary schools, new railway station, green infrastructure, nature reserve, etc which will be of benefit to existing local communities as well as those located within the new development. Loss of the existing village feel can be addressed through effective masterplanning to safeguard the character of existing villages and hamlets whilst providing new cycling and walking links to new facilities. Work is ongoing to ensure development can be accommodated without impacting negatively on the Severn Estuary and biodiversity assets. Providing good transport links will be critical to the success of the proposals and transport modelling is underway to ensure the strategic and local road network will be upgraded to provide for the new settlement. The site will be subject to transport modelling and detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## **The Berkeley Cluster –Wisloe**

### **PS37 Land at Wisloe**

#### **Physical constraints**

- The land is in a floodplain with high water table

#### **Potential impacts**

- Coalescence of existing villages
- Extra pressure on services and infrastructure of Cam and Dursley
- Pressure on surrounding road system
- Loss of agricultural land
- Vicinity to motorway would be unpleasant for residents
- Impact on the Severn Estuary SAC and the Wildlife Trust
- Impact on views from AONB
- Scale is too large for the area
- Lack of local employment leading to increased car journeys
- Too close to motorway creating an unpleasant place to live

#### **Opportunities**

- Good access and traffic links, Close to Cam and Dursley station



- Education, health and leisure provision for wider community
- New cycling and walking routes

### **Council's response**

Wisloe is well located adjacent to the A38 and near to Cam & Dursley rail station to provide a relatively sustainable location for growth with wider facilities and services at nearby Cam and Dursley. Development of a new settlement at Wisloe provides the opportunity to transform the level of local facilities which piecemeal development could not provide. The new development will provide local centre facilities including retail and community provision as well as primary school(s), green infrastructure, etc. which will be of benefit to nearby existing local communities as well as those located within the new development. A number of technical studies have been undertaken to explore potential constraints which have identified that: the fields do not contain best and most versatile agricultural land; archaeological resources are unlikely to preclude development; the site is at low risk of flooding but the drainage strategy will seek to improve flood risk for downstream communities. Noise modelling and further ecological work is required which is likely to affect the design and payout of the site but would not prevent development. Coalescence of villages can be avoided through generous green infrastructure and strategic landscaping which is characteristic of a garden community. There are opportunities to provide new and better links for cyclists and pedestrians to the local network, to improve access to Cam & Dursley rail station and to facilities at Cam. The site will be subject to transport modelling and detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## Wotton Cluster – Kingswood

### **PS38 South of Wickwar Road**

#### **Physical constraints**

- No comments received

#### **Potential impacts**

- Capacity of Kingswood Primary School
- Lack of local facilities and services to support development
- Impact on character of village

#### **Opportunities**

- Close to large employer (Renishaw)
- New walking and cycling links
- Play space provision

### **Council's response**

The site provides the opportunity to allow for further modest growth at Kingswood whilst respecting the landscape sensitivity of the area to housing. The site is particularly well screened. The biggest constraint relates to the lack of capacity at the local school to accommodate further children within the village. A number of options are being considered and the site is considered



suitable subject to satisfactory resolution of this issue. Detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## PS39 South of Walk Mill Lane

### Physical constraints

- No comments received

### Potential impacts

- Capacity of Kingswood Primary School
- Lack of local facilities and services to support development
- Impact on character of village

### Opportunities

- Close to large employer (Renishaw)
- New walking and cycling links
- Play space provision

### Council's response

The site is located within a land parcel which has less landscape sensitivity to further housing than other sites to the north and west of the village. However, the site is open to the south-east and is being promoted for a level of development in excess of a level considered appropriate for the village given the position of the settlement within the hierarchy and in particular the lack of capacity at the local school to accommodate further children within the village.

## The Wotton Cluster – Wotton-under-Edge

### PS40 Katherine Lady Berkeley School

### Physical constraints

- No comments received

### Potential impacts

- Loss of open field
- Residential development would be isolated

### Opportunities

- Convenient location for KLB school

### Council's response

The site has been considered as a potential extension to Katherine Lady Berkeley School but to date there has been no confirmation from the landowner that the site could be released for such uses. Therefore, at this stage, there is no evidence that the site is deliverable and has been deleted as a potential allocation for school and community and open space uses.



# The Cotswold Cluster – Painswick

## PS41 Washwell Fields

### Physical constraints

- Narrow lane access

### Potential impacts

- Loss of open space impacting character
- Heritage setting impact
- Site currently used by local wildlife
- Loss of grazing land
- Visual impact on surrounding countryside

### Opportunities

- Infill plot
- Sustainable location with local transport links and walking distance to local facilities
- Potential provision of affordable homes

### Council's response

Further landscape assessment work has confirmed that the site is appropriate for development subject to retaining a minimum 50 metre gap between the development and the Washwell Farm complex and subject to other mitigation measures including tree and hedge planting along the northern boundary. Initial heritage assessment identified that development would be unlikely to affect the setting of Washwell House to the extent that it would harm its character significantly and has little relationship with the Gyde House conservation area. The provision of a satisfactory access remains a matter to be resolved. Detailed policy wording will be developed taking into account local views for the final Local Plan in 2020.

## Alternative sites

As part of the 2018 Emerging Strategy consultation the Council asked whether people would like to promote alternative sites for consideration. The table below lists suggested sites that have previously been assessed through the SALA process. A list of suggested new sites, not previously assessed, can be viewed on the SALA page of the Council's website.

Settlement	Suggested alternatives
<b>The Stroud Valleys</b>	
Amberley	No alternative sites suggested
Brimscombe & Thrupp	BRI007, BRI009
Chalford	CHA001
Horsley	No alternative sites suggested
Manor Village	MAN001
Minchinhampton	MIN007
Nailsworth	NAI003, NAI004, NAI007, NAI010



North Woodchester	STR043
Stroud	STR021, STR023, STR024, STR031, STR035, STR041, STR043, STR047, STR049
Whiteshill & Ruscombe	No alternative sites suggested
<b>The Stonehouse Cluster</b>	
Eastington (Alkerton)	EAs001, EAS002, EAS003, EAS004, EAS005, EAS008, EAS011, EAS013, EAS014, EAS015
Kings Stanley	KST002
Leonard Stanley	LEO001, LEO004, LEO005
Stonehouse	STO06, STO015, STO017
<b>Cam &amp; Dursley</b>	
Cam	CAM003, CAM010, CAM011, CAM015, CAM016, CAM023, CAM024
Coaley	COA001
Dursley	DUR009
Uley	No alternative sites suggested
<b>The Gloucester Fringe</b>	
Hardwicke	HAR005, HAR006, HAR007, HAR008, HAR009, HAR012, HAR013, G1 (to meet Stroud's needs)
Upton St Leonards	UPT002, UPT003, UPT004, UPT006, UPT007, UPT012
<b>The Berkeley Cluster</b>	
Berkeley	BER005, BER008, BER011, BER012, BER013
Newtown & Sharpness	No alternative sites suggested
Slimbridge	No alternative sites suggested
Wisloe	CAM0015, CAM016
<b>Severn Cluster</b>	
Frampton on Severn	FRA002
Whitminster	WHI001, WHI005, WHI007, WHI008
<b>The Wotton Cluster</b>	
Kingswood	KIN001, KIN007, KIN008
North Nibley	NIB001
Wotton-under-Edge	WUE001
<b>The Cotswold Cluster</b>	
Bisley	No alternative sites suggested
Oakridge Lynch	No alternative sites suggested
Painswick	PAI007, PAI008, PAI012

### Council's response

The principle of development at the above settlements has been assessed as part of the generation and selection of strategy options. In addition, all sites have been subject to initial assessment through the Council's Strategic Assessment of Land Availability (SALA) process. The results of this work have informed the preferred development strategy and the list of sites for allocation. Sites that are not considered suitable or available for allocation are set out in the SALA reports and the Sustainability Appraisal of alternative sites with reasons for not taking these sites forward.





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