

# URS

## Sustainability Appraisal (SA) of the Stroud Local Plan

Interim SA Report

April 2013

UNITED KINGDOM & IRELAND



Prepared for:



## REVISION SCHEDULE

Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	April 2013	Interim SA Report	Sophie Corbett Senior Consultant	Mark Fessey Senior Consultant	Steve Smith Technical Director

### Limitations

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

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

The methodology adopted and the sources of information used by URS in providing its services are outlined in this Report. The work described in this Report was undertaken in 2013 and is based on the conditions encountered and the information available during the said period of time. The scope of this Report and the services are accordingly factually limited by these circumstances.

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

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

### Copyright

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

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

**TABLE OF CONTENTS**

<b>INTRODUCTION.....</b>	<b>1</b>
<b>1 BACKGROUND .....</b>	<b>2</b>
<b>2 SA EXPLAINED .....</b>	<b>2</b>
<b>3 THIS INTERIM SA REPORT.....</b>	<b>2</b>
<b>4 STRUCTURE OF THIS INTERIM SA REPORT .....</b>	<b>2</b>
<b>PART 1: WHAT’S THE SCOPE OF THE SA? .....</b>	<b>3</b>
<b>5 INTRODUCTION (TO PART 1).....</b>	<b>4</b>
<b>6 WHAT IS THE PLAN SEEKING TO ACHIEVE?.....</b>	<b>5</b>
<b>7 WHAT’S THE SUSTAINABILITY ‘CONTEXT’?.....</b>	<b>6</b>
<b>8 WHAT’S THE SUSTAINABILITY ‘BASELINE’?.....</b>	<b>11</b>
<b>9 WHAT ARE THE KEY ISSUES? .....</b>	<b>19</b>
<b>PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?.....</b>	<b>21</b>
<b>10 INTRODUCTION (TO PART 2).....</b>	<b>22</b>
<b>11 SA OF ALTERNATIVE DEVELOPMENT STRATEGIES (2012) .....</b>	<b>22</b>
<b>PART 3: WHAT ARE THE SA FINDINGS AT THIS STAGE? .....</b>	<b>24</b>
<b>12 INTRODUCTION (TO PART 3).....</b>	<b>25</b>
<b>13 APPRAISAL FINDINGS.....</b>	<b>26</b>
<b>PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?.....</b>	<b>50</b>
<b>15 INTRODUCTION (TO PART 4).....</b>	<b>51</b>
<b>16 PLAN FINALISATION.....</b>	<b>51</b>
<b>17 ADOPTION AND MONITORING .....</b>	<b>51</b>

## **INTRODUCTION**

## 1 BACKGROUND

- 1.1.1 URS is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Stroud District Local Plan. SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the Local Plan is a legal requirement.<sup>1</sup>

## 2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transpose into national law the EU Strategic Environmental Assessment Directive.<sup>2</sup>
- 2.1.2 The Regulations require that **a report is published for consultation alongside the draft plan** that *'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'*.<sup>3</sup>
- 2.1.3 The Regulations prescribe the information that must be contained within the report, which for the purposes of SA is known as **'the SA Report'**. Essentially, there is a need for the SA Report to answer the following four questions:
1. What's the scope of the SA?
  2. What has Plan-making / SA involved up to this point?
    - Preparation of the draft plan must be informed by SA of 'reasonable alternatives'
  3. What are the SA findings at this stage?
    - i.e. in relation to the draft plan.
  4. What happens next (including monitoring)?

## 3 THIS INTERIM SA REPORT

- 3.1.1 At the current stage of plan-making the Council is not consulting on a draft plan. Rather, the Council is consulting on a range of preferred policies (both 'Core' and 'Delivery'). The Council introduce the purpose of the consultation as follows –

*'We would like your views on these policies. In particular, we would like to know if you agree with what the policies are trying to achieve, or whether changes need to be made to make them better. We would also like to know if there are any new policies which we should include in the Local Plan, to address planning matters that you are concerned about.'*

- 3.1.2 This Interim SA Report has been produced with the intention of informing the consultation and to assist stakeholders in responding to it. It is also the intention that the findings/recommendations presented within this Interim SA Report will be taken into account by the Council subsequent to the consultation, when preparing the draft plan.

## 4 STRUCTURE OF THIS INTERIM SA REPORT

- 4.1.1 This Interim SA Report does not have to provide the information required of the SA Report, but it is useful to structure it according to the four 'appraisal questions' (listed above) nonetheless.

---

<sup>1</sup> The Local Planning Regulations 2012 require that an SA Report is published alongside the 'Proposed Submission' plan document.

<sup>2</sup> Directive 2001/42/EC

<sup>3</sup> Regulation 12(2)

## **PART 1: WHAT'S THE SCOPE OF THE SA?**

**5 INTRODUCTION (TO PART 1)**

5.1.1 In order to introduce the reader to the scope of the SA, this 'part' of the Report answers the following questions:

- What's the Plan seeking to achieve?
- What's the sustainability 'context'?
- What's the sustainability 'baseline'?
- What are the key issues that should be a focus of SA?

## 6 WHAT IS THE PLAN SEEKING TO ACHIEVE?

- 6.1.1 The new Local Plan, once adopted, will present a spatial strategy for the District up to 2026. It will determine the distribution of various kinds of development around the District and will provide a policy framework that will ultimately provide the basis for a wide range of planning decisions in the future.
- 6.1.2 The six principal objectives are:
- Maintaining and improving the accessibility to services and amenities for our communities with: healthcare for all residents; affordable and decent housing for local needs; active social, leisure and recreation opportunities; and youth and adult learning opportunities;
  - Providing for a strong, diverse, vibrant local economy that enables balanced economic growth, coupled with enhanced job opportunities across the District;
  - Conserving and enhancing Stroud District's distinctive qualities, based on landscape, townscape and biodiversity;
  - Promoting healthier alternatives to the use of the private car and seeking to reduce CO<sub>2</sub> emissions by using new technologies and encouraging an integrated transport system to improve access to local goods and services;
  - Promoting a development strategy that mitigates global warming and adapts to climate change by: securing energy efficiency through building design; maximising the re-use of buildings and recycling of building materials; minimising the amount of waste produced and seeking to recover energy; promoting the use of brownfield land; and minimising and mitigating against future flood risks and recycling water resources;
  - Improving the safety, vitality and viability of our town centres, which link to and support the needs of their rural hinterlands.

## 7 WHAT'S THE SUSTAINABILITY 'CONTEXT'?

### 7.1 Introduction

- 7.1.1 An important step when seeking to establish the appropriate 'scope' of an SA involves reviewing 'sustainability context' messages (e.g. issues, objectives or aspirations) set out within relevant published plans, policies, strategies and initiatives (PPSIs). Sustainability context messages are important as they help us to understand the *broad* scope of issues that should be a focus of the SA.
- 7.1.2 A brief sustainability context review is presented below. There is a focus on the National Planning Policy Framework (NPPF), but 'the net is also cast wider' as appropriate.

### 7.2 Air

- The NPPF identifies that there is a need to: prevent 'both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability'.
- The NPPF identifies that '*Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan*'.

### 7.3 Biodiversity

- There is a need to halt the overall decline in biodiversity and the degradation of ecosystem services<sup>4</sup>; and restore them in so far as feasible and seek to deliver net gains in biodiversity where possible<sup>5</sup>.
- Local plans should support healthy well-functioning ecosystems, encourage the 'preservation, restoration and re-creation of priority habitats, ecological networks' and promote the 'protection and recovery of priority species'<sup>5</sup>.
- Local plans should adopt a 'landscape approach' to protecting and enhancing biodiversity<sup>5</sup>. This focuses on the conservation of biodiversity over large areas of land (i.e. at the landscape scale) where habitat patches that are now fragmented would once have functioned more as an interconnected whole<sup>6</sup>.
- There is a need to protect and maximise the value of areas already rich in wildlife; expand, buffer, and create connections and stepping stones between these areas; and make the wider landscape more permeable to wildlife<sup>6</sup>.
- Positive planning for 'green infrastructure' is recognised as part of planning for ecological networks and making the built environment permeable for wildlife<sup>7</sup>.
- New development should incorporate green space consisting of a 'network of well-managed, high-quality green/open spaces linked to the wider countryside'<sup>8</sup>. These spaces should be of a range of types (e.g. community forests, wetland areas and public parks) and be multifunctional, for instance as areas that can be used for walking and cycling, recreation

<sup>4</sup> DCLG (2012) National Planning Policy Framework [online] available at:

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf> (accessed 08/2012)

<sup>5</sup> Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at:

<http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf> (accessed 08/2012)

<sup>6</sup> The Wildlife Trusts (2010) A Living Landscape: play your part in nature's recovery [online] available at:

<http://www.wildlifetrusts.org/aliveinglandscape> (accessed 08/2012)

<sup>7</sup> The Wildlife Trusts & TCPA (2012) Planning for a healthy environment: good practice for green infrastructure and biodiversity [online] available at: <http://www.wildlifetrusts.org/news/2012/07/06/planning-healthy-and-natural-environment> (accessed 08/2012)

<sup>8</sup> TCPA (2012) Creating garden cities and suburbs today [online] available at:

[http://www.tcpa.org.uk/data/files/Creating\\_Garden\\_Cities\\_and\\_Suburbs\\_Today.pdf](http://www.tcpa.org.uk/data/files/Creating_Garden_Cities_and_Suburbs_Today.pdf) (accessed 08/2012)

and play, supporting of wildlife, or forming an element of an urban cooling and flood management system.

#### 7.4 Climate change mitigation

- The need to ‘support the transition to a low carbon future in a changing climate’ is a ‘core planning principle’<sup>9</sup>.
- Planning should play a key role in securing ‘radical reductions’ in greenhouse gas (GHG) emissions planning for new development in locations and ways which reduce GHG emissions<sup>9</sup> in order to meet the targets set out in the Climate Change Act 2008<sup>10</sup>.
- Local plans should support energy efficiency improvements to existing buildings and extensions<sup>9 11</sup>.
- Local plans should positively promote renewable energy technologies and consider identifying suitable areas for their construction<sup>9</sup>; working with developers to make renewable energy projects acceptable to local communities<sup>11</sup>.
- Local plans should encourage transport solutions that support reductions in greenhouse gas emissions and reduce congestion<sup>9</sup>; notably through concentrating new developments in existing cities and large towns and/or ensuring they are well served by public transport<sup>11</sup>.
- There is a need for local plans to reduce the production of waste and use it as a resource wherever possible<sup>12</sup>.

#### 7.5 Community and wellbeing

- A ‘core planning principle’ of the NPPF is to ‘take account of and support local strategies to improve health, social and cultural wellbeing for all’ and support vibrant and healthy communities<sup>9</sup>.
- There is ‘overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities’<sup>13</sup>. To ensure that the built environment promotes health and reduces inequalities for all local populations there is a need to:
  - fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality;
  - prioritise policies and interventions that both reduce health inequalities and mitigate climate change by improving active travel; good quality open and green spaces; the quality of food in local areas; and the energy efficiency of housing; and
  - support locally developed and evidence-based community regeneration programmes that remove barriers to community participation and action; and reduce social isolation.
- Protection and promotion of town centres is encouraged; and planning policies should promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship<sup>9</sup>. Developments which provides high quality social infrastructure, including education, skills and sports facilities are to be supported, and those which involve their net loss should be resisted<sup>13</sup>.

<sup>9</sup> DCLG (2012) National Planning Policy Framework [online] available at:

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf> (accessed 08/2012)

<sup>10</sup> The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline.

<sup>11</sup> Committee on Climate Change (2012) How local authorities can reduce emissions and manage climate risk [online] available at:

[http://hmccc.s3.amazonaws.com/Local%20Authorities/1584\\_CCC\\_LA%20Report\\_bookmarked\\_1b.pdf](http://hmccc.s3.amazonaws.com/Local%20Authorities/1584_CCC_LA%20Report_bookmarked_1b.pdf) (accessed 08/2012)

<sup>12</sup> Planning Policy Statement 10: Planning for Sustainable Waste (2011) [online] available at:

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/1876202.pdf> (accessed 09/2012)

<sup>13</sup> The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at:

<http://www.nice.org.uk/nicemedia/live/12111/53895/53895.pdf> accessed 08/2012)

- Travellers should be treated in a fair and equal manner that facilitates their traditional and nomadic way of life, whilst also respecting the interest of the settled community, through promoting more private traveller site provision, whilst recognising that there will be those that cannot afford private sites; enabling the provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and having due regard for the protection of local amenity and environment<sup>14</sup>.

## 7.6 Economy and employment

- The planning system should contribute to building a strong, responsive economy by 'ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure'<sup>15</sup>.
- In order to revitalise town centres and high streets it is necessary for Local Authorities to re-imagine these places, ensuring that they offer something new and different that neither out-of-town shopping centres nor the internet can offer, rather than simply relying on retail provision<sup>16</sup>.
- Lower order retail and service facilities, which provide neighbourhood level provision, can provide economic resilience, act as a 'hub' for local communities, and play an important role in the shopping hierarchy because of their accessibility<sup>17</sup>.
- Local plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas and promote the development and diversification of agricultural and other land-based rural businesses. The improvement of transport links and the provision of adequate digital infrastructure can facilitate the 'significant untapped potential' of rural areas to contribute to economic growth and employment<sup>18</sup>.

## 7.7 Housing

- The NPPF states that local planning authorities should have a clear understanding of housing needs in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.
- The NPPF states that, in rural areas, when exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.

## 7.8 Landscape and cultural heritage

- Authorities should set out in their local plan a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk. Assets should be recognised as being an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural,

<sup>14</sup> DCLG (2012) Planning policy for traveller sites [online] available at:

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/2113371.pdf> (accessed 08/2012)

<sup>15</sup> DCLG (2012) National Planning Policy Framework [online] available at:

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf> (accessed 08/2012)

<sup>16</sup> High streets at the heart of our communities: The Government's response to the Mary Portas Review [online] available at:

<http://www.communities.gov.uk/publications/regeneration/portasreviewresponse> (accessed 08/2012)

<sup>17</sup> DCLG (2012) Parades of shops: towards an understanding of performance and prospects [online] available at:

<http://www.communities.gov.uk/documents/regeneration/pdf/2156925.pdf> (accessed 08/2012)

<sup>18</sup> Federation of Small Businesses (2012) The Missing Links - Revitalising our rural economy [online] available at:

[http://www.fsb.org.uk/policy/assets/rural\\_report\\_web\\_final\\_proof.pdf](http://www.fsb.org.uk/policy/assets/rural_report_web_final_proof.pdf) (accessed 08/2012)

economic and environmental benefits' that conservation can bring, whilst also recognising the positive contribution new development can make to local character and distinctiveness.

- The planning system should protect and enhance valued landscapes. Particular weight is given to 'conserving landscape and scenic beauty'. Local Authorities should adopt policies and measures for the protection, management and planning of all landscapes, whether outstanding or ordinary, that determine the quality of people's living environment.<sup>19</sup>
- Authorities are encouraged to 'plan positively to enhance the beneficial use of the Green Belt, with inappropriate development not to be approved 'except in very special circumstances'<sup>20</sup>.
- Authorities can 'set out their own approach to housing density to reflect local circumstances' but should also look to 'encourage the effective use of land' through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'.

## 7.9

### Soil

- The NPPF identifies that there is a need to: prevent 'both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability'.
- The NPPF calls upon the planning system to 'protect and enhance soils'. It should also prevent new or existing development from being 'adversely affected' by the presence of '*unacceptable levels of soil pollution or land instability and be willing to remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land, where appropriate*'.
- The NPPF calls for planning policies and decisions to 'encourage the effective use of land' through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to 'set out their own approach to housing density to reflect local circumstances'. The value of best and most versatile agricultural land should also be taken into account.
- In Safeguarding our Soils: A strategy for England<sup>21</sup>, a vision is set out for the future of soils in the country. An element of this vision is the condition of soils in urban areas, which are to be '*sufficiently valued for the ecosystem services they provide and given appropriate weight in the planning system*'. Good quality soils in urban areas are recognised as being 'vital in supporting ecosystems, facilitating drainage and providing urban green spaces for communities'. That planning decisions take sufficient account of soil quality is a concern of the report, in particular in cases where 'significant areas of the best and most versatile agricultural land are involved'. Preventing the pollution of soils and addressing the historic legacy of contaminated land is another element of the reports vision. Changing demands on our soils need to be better understood and it must be ensured that 'appropriate consideration is given to soils in the planning process'.

## 7.10

### Transport and accessibility

- The NPPF states that the transport system should be balanced 'in favour of sustainable transport', with developments to be located and designed to facilitate these modes of travel, in order to minimise journey lengths for employment, shopping, leisure and other activities. Planning policies should also aim for 'a balance of land uses' and wherever practical, key facilities should be located within walking distance of most properties.

<sup>19</sup> Council of Europe (2000) The European Landscape Convention [online] available at: <http://conventions.coe.int/Treaty/en/Treaties/Html/176.htm> (accessed 08/2012)

<sup>20</sup> DCLG (2012) National Planning Policy Framework [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf> (accessed 08/2012)

<sup>21</sup> Defra (2009) Safeguarding our Soils: A strategy for England [online] available at: <http://archive.defra.gov.uk/environment/quality/land/soil/documents/soil-strategy.pdf> (accessed 11/2012)

- Higher levels of walking and cycling could reduce congestion, improve local environmental quality, improve personal health and reduce transport-related CO<sub>2</sub> emissions<sup>22</sup>. Plans should ensure that local, strategic policies support and encourage both walking and cycling<sup>23</sup>.

### 7.11 Waste

- The Government's Review of Waste Policy in England' (2011) recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials. As such, it sets out a vision to move beyond our current 'throwaway society' to a 'zero waste economy'. The report recognises that planning will play a critical role in delivering this ambition.
- Local Authority Waste Management Statistics for England - 2011/12<sup>24</sup> showed -
  - 43% of household waste recycled (the highest percentage on record but the lowest annual increase in ten years)
  - 22.9 million tonnes of household waste generated equal to 431kg of waste per person (continuing the pattern of annual reductions seen since 2007/2008)
  - 10.7 million tonnes of waste collected recycled, composted or reused by local authorities (for the first time this figure was greater than the amount landfilled)

### 7.12 Water

- Local Plans should take account of the effects of climate change in the long term, taking into account factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape<sup>25</sup>.
- Planning authorities are encouraged to 'adopt proactive strategies' to adaptation. New developments should be planned so that they avoid increased vulnerability to climate change impacts. Where new development is at risk to such impacts, this should be managed through adaptation measures including the planning of green infrastructure<sup>25</sup>.
- Development should be directed away from areas at highest risk from flooding, and should 'not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere<sup>25</sup>.
- The Flood and Water Management Act<sup>26</sup> sets out the following approaches to flood risk management:
  - Incorporating greater resilience measures into the design of new buildings, and retrofitting at risk properties (including historic buildings);
  - Utilising the environment, such as management of the land to reduce runoff and harnessing the ability of wetlands to store water; and
  - Identifying areas suitable for inundation and water storage.
- Local planning authorities should produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply<sup>25</sup> and should encourage and incentivise water efficiency measures at the demand side<sup>27</sup>.

<sup>22</sup> Lancaster University, University of Leeds & Oxford Brookes University (2011) Understanding Walking and Cycling: Summary of Key Findings and Recommendations [online] available at: [http://www.its.leeds.ac.uk/fileadmin/user\\_upload/UWCReportSept2011.pdf](http://www.its.leeds.ac.uk/fileadmin/user_upload/UWCReportSept2011.pdf) (accessed 08/2012)

<sup>23</sup> National Institute for Health and Care Excellence (2012) Walking and cycling: local measures to promote walking and cycling as forms of travel or recreation, Public Health Guidance PH41 [online] available at: <http://guidance.nice.org.uk/PH41>

<sup>24</sup> Defra (2012) Local Authority collected waste for England [online] available at: <http://www.defra.gov.uk/statistics/environment/waste/wrfq22-wrmwqtr/>

<sup>25</sup> DCLG (2012) National Planning Policy Framework [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf> (accessed 08/2012)

<sup>26</sup> Flood and Water Management Act (2010) [online] at: <http://www.legislation.gov.uk/ukpga/2010/29/contents> (accessed 08/12)

## 8 WHAT'S THE SUSTAINABILITY 'BASELINE'?

### 8.1 Introduction

8.1.1 Another important step when seeking to establish the appropriate 'scope' of an SA involves reviewing the 'baseline' for a range of sustainability issues. This provides benchmarks for appraising the likely significant effects of implementing the plan and reasonable alternatives.

8.1.2 A summary of the sustainability baseline review is presented below.

### 8.2 Air quality

- There are no Air Quality Management Areas in the District; or other specific air quality issues that we are aware of

### 8.3 Biodiversity

#### The current situation

- Stroud District falls within two National Character Areas: the Cotswolds to the east and the Severn and Avon Vales to the west.
- There is one internationally recognised site: the Severn Estuary SPA/SAC/Ramsar site. The District is bordered by 42 kilometres of Severn Estuary coastline<sup>28</sup>.
- There are 30 nationally important Sites of Special Scientific Interest (SSSI) in the District, covering an area of 32.57 sq km. The most common reason for the unfavourable condition of the SSSIs is likely to be a lack of appropriate management.
- There is also a network of locally important 'Key Wildlife Sites' covering an area of 33.08 sq km.<sup>28</sup>
- Ancient Woodland and Limestone Grassland habitat types are a focus of conservation effort.

#### The likely situation in the future (assuming no intervention through the plan)

- A number of European sites and SSSIs have unfavourable and / or declining status, a problem that appears to affect Ancient Woodland and Limestone Grassland habitat types in particular. The value of these sites for biodiversity and nature conservation will decrease into the future unless action is taken to address the causes.

### 8.4 Climate change mitigation

#### The current situation

- The District has a higher emission per capita than the region as a whole. Emissions from the District increased from 2005–2006 and this reflected an increase across the region. In Stroud District emissions from road transport are a major contributor to emissions, this reflects the rural nature of the District where there is likely to be a greater amount of trips by road than in urban areas.
- Studies have estimated the UK's total theoretical tidal range resource at between 25 and 30GWs – enough to supply around 12% of current UK electricity demand. The majority of this is in the Severn estuary (which has between 8 and 12GW)<sup>29</sup>.

<sup>27</sup> Defra (2011) Water for life (The Water White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf> (accessed 08/2012)

<sup>28</sup> Stroud District Council (2010) Stroud District Annual Monitoring Report 2009/2010 [online] available at: [http://www.stroud.gov.uk/info/planning/Annual\\_Monitoring\\_Report\\_2009\\_10.pdf](http://www.stroud.gov.uk/info/planning/Annual_Monitoring_Report_2009_10.pdf) (accessed 25/03/2013)

<sup>29</sup> Wave and tidal energy: part of the UK's energy mix, DECC, 2013  
<https://www.gov.uk/wave-and-tidal-energy-part-of-the-uks-energy-mix> (accessed 25/03/2013)

#### The likely situation in the future (assuming no intervention through the plan)

- It seems probable that the transport sector will continue to increase its contribution to the UK total emissions of greenhouse gases. Road traffic continues to rise and there is increasing concern about the role of air travel in adding to emissions.
- The two-year cross-government Severn tidal power feasibility study could not see a strategic case for public investment in a Severn tidal scheme in the immediate term, although private sector groups are continuing to investigate the potential<sup>30</sup>.

## 8.5 Community and Wellbeing

#### The current situation

- The 2011 population estimate for the District was 113,100<sup>31</sup>. The population age structure shows that the age distribution for the District differs in certain respects from the national profile. In particular the District has a higher proportion of people in the older age groups (45 years and upwards).
- The Stroud District Annual Monitoring Report 2009 – 2010 estimates that the District's population will increase to over 120,000 by 2029<sup>32</sup>.
- General health appears relatively good, with about 71% of residents describing their health as 'good', compared with about 69% in the South West and England as a whole. Work undertaken by the Council in developing the Community Strategy revealed that the District's high quality natural environment influences this perception of good health.
- Stroud District is a relatively low crime area. The rate of offending in the District is lower than the South West or England averages in each category of crime. The total number of crimes within the District during 2006-07 was 7872<sup>33</sup>. The crime rate per 1000 population for the District is the highest of the four other rural districts within the County, but far below that for the cities of Gloucester and Cheltenham and significantly less than the County rate.
- Youth crime rates (Aug 2007 to July 2008) in the Stroud District<sup>33</sup> are slightly above the County rate and are the second highest in the County behind Gloucester City. A breakdown highlights that violence against the person, criminal damage and theft are the most prevalent crimes among young offenders.
- The Audit Commission Quality of Life Indicator compiled from Gloucestershire Community Safety Partnership Perception of Crime Survey 2008, revealed that 94% of respondents living in Stroud District feel safe in the daytime. Just over half feel safe at night, which is better than the County figure.
- Figure 8.1 shows deprivation across the District.

<sup>30</sup> DECC (2013) Wave and tidal energy: part of the UK's energy mix [online] available at:

<https://www.gov.uk/wave-and-tidal-energy-part-of-the-uks-energy-mix> (accessed 25/03/2013)

<sup>31</sup> Office for National Statistics (2011) Labour Market Profile: Stroud. Available at:

<http://www.nomisweb.co.uk/reports/lmp/la/2038431926/report.aspx#tabrespop> (accessed 23/03/2013)

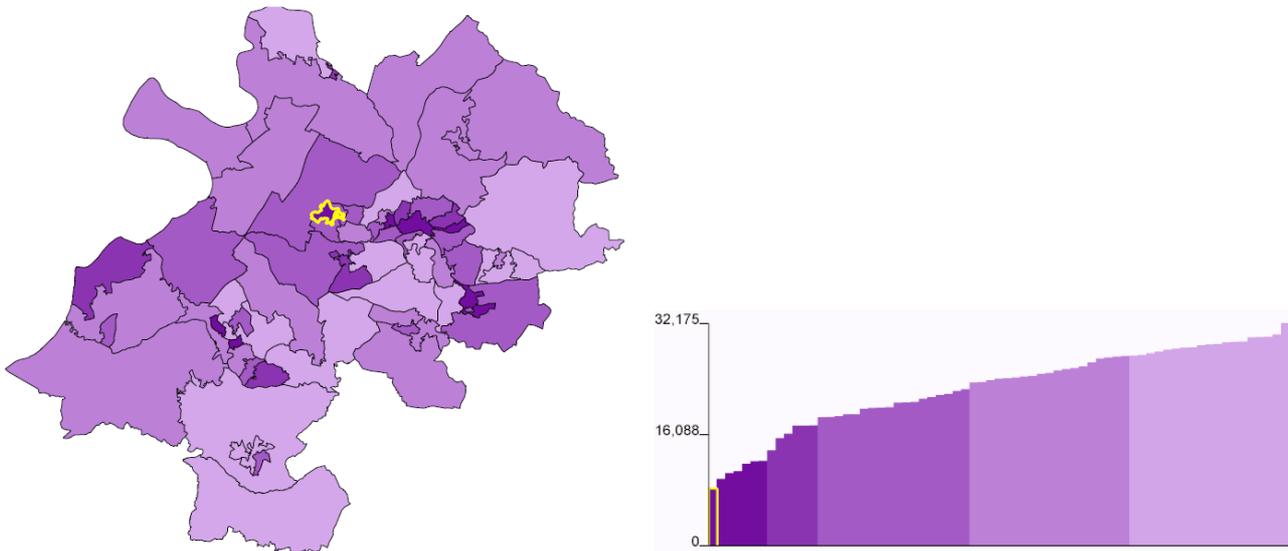
<sup>32</sup> Stroud District Council (2010) Stroud District Annual Monitoring Report 2009/2010 [online] available at:

[http://www.stroud.gov.uk/info/planning/Annual\\_Monitoring\\_Report\\_2009\\_10.pdf](http://www.stroud.gov.uk/info/planning/Annual_Monitoring_Report_2009_10.pdf) (accessed 23/03/2013)

<sup>33</sup> Data from iQuanta reported in Stroud District Council Annual Monitoring Report (2008) available at:

[www.stroud.gov.uk/info/annual\\_monitoring\\_report\\_2008.pdf](http://www.stroud.gov.uk/info/annual_monitoring_report_2008.pdf) (accessed 28/01/09)

Figure 8.1: Multiple Deprivation across Stroud District by Super Output Area (with worst performing / most deprived SOA highlighted)



The likely situation in the future (assuming no intervention through the plan)

- Population projections indicate that population increase is likely to continue with a 9.3% growth in population in the District predicted between 2008 and 2033.<sup>32</sup>
- In common with the South West as a whole, Stroud District is likely to continue to have a somewhat older population age profile than the rest of England.
- Demands on health care in the District are set to increase. People are living longer and the South West has a higher proportion of older people than the other English regions.
- Trend data for deaths (all ages, all causes), deaths from heart disease and strokes and deaths from cancer reveal a downward trend in the age standardised death rate in the District.
- Crime appears to be falling in the District. The increase in the number of offences of Crime against the Person demonstrated between 2003 and 2006 may in part have been a consequence of the introduction of the national crime recording standard (NCRS):. Recent figures for this crime suggest a fall in the number of recorded offences.

8.6 Economy and employment

The current situation

- Despite the national picture of a structural decline in manufacturing, the Stroud District Employment Land Review (2013) reveals that this sector continues to be very important to the economy. It generates over 22% of all the jobs, more than double the regional and national averages. The largest sector share (24%) is associated with public sector employment, although this is less than the County, regional and national averages<sup>34</sup>.
- The analysis of the economy undertaken by the Stroud District Employment Land Review revealed that the economy has grown significantly in terms of service based employment with this growth being particularly driven by the expansion of business services, banking and finance services.
- Stroud and Stonehouse are established market towns.

- Stroud District is an affluent area, amongst the top 25% least deprived local authority areas of England<sup>34</sup>.
- Statistics indicate that 81% of the District's economically active population (i.e. the population that is either employed or actively seeking employment) is in employment. This is higher than the South West (73.6%) and UK average (70.5%)<sup>35</sup>.
- Overall, while the District's residents are better paid than the regional average, one clear problem is that the disparity between male and female earnings is wider than in the region. Gross weekly pay for female workers in the District is only just above that for region. For male workers in the District the gross weekly pay is around £60 more than the average for the region.
- Although residents are relatively well-paid, people whose workplace is located in the District are comparatively poorly remunerated. This demonstrates that the best-paid residents work outside the District and suggests that the District would benefit from inward investment from higher paying employers.

#### The likely situation in the future (assuming no intervention through the plan)

- Economic performance in the District will be strongly influenced by the performance of the UK economy, and hence making predictions is inherently difficult.
- The landscape, built environment and natural heritage of the canal corridor once improved in quality, has the potential to contribute to the positive high quality environment upon which the tourism industry and inward investment relies.
- The economic base of the District is changing from one based on manufacturing to one which is service related. There was been growth in the creative industries as well as growth based on green alternative technologies. Agriculture, while more significant in Stroud District than in many other parts of the country, provides only relatively limited employment in the District.
- The availability of brownfield sites and the potential for historic buildings to be converted for alternative uses, in particular business, has the potential to increase employment opportunities.

## 8.7 Housing

### The current situation

- The Council's current annual housing target of 455 dwellings is based upon the minimum target set out in the Secretary of State's Proposed Changes to the draft Regional Spatial Strategy for the South West<sup>36</sup>.
- The number of dwellings built over recent years has fluctuated; however the Council's most recent Annual Monitoring Report<sup>36</sup> indicates that from 2006 to 2010 housing delivery in the District fell below the target by 115 dwellings.
- The Council's Housing Needs Assessment (2010)<sup>37</sup> identifies the total gross future need for affordable housing in the District to be 809 dwellings per year and the annual net future housing need to be 346 dwellings.
- The number of affordable units built each year in the District has varied year on year however completions increased overall from 2004 to 2009<sup>36</sup>.

<sup>34</sup> AECOM and BE Group (2013) Stroud District Council Employment Land Review – Final Report [online] available at: [http://www.stroud.gov.uk/info/planning/employment\\_land\\_study\\_final\\_report.pdf](http://www.stroud.gov.uk/info/planning/employment_land_study_final_report.pdf)

<sup>35</sup> Office for National Statistics (2011) Labour Market Profile: Stroud [online] available at:

<http://www.nomisweb.co.uk/reports/lmp/la/2038431926/report.aspx#tabrespop> (accessed 23/03/2013)

<sup>36</sup> Stroud District Council (2010) Stroud District Annual Monitoring Report 2009/2010 [online] available at: [http://www.stroud.gov.uk/info/planning/annual\\_monitoring\\_report\\_2009\\_10.pdf](http://www.stroud.gov.uk/info/planning/annual_monitoring_report_2009_10.pdf) (accessed 25/03/2013)

<sup>37</sup> Fordham Research (2010) Stroud District Council Housing Needs Assessment [online] available at: [http://www.stroud.gov.uk/info/plan\\_strat/housing\\_needs\\_09.pdf](http://www.stroud.gov.uk/info/plan_strat/housing_needs_09.pdf) (accessed 02/04/2013)

- The average house price in Stroud District in 2009 was £180,000, which is above both the southwest (£175,000) and national (£170,000) average<sup>38</sup>.

#### The likely situation in the future (assuming no intervention through the plan)

- It looks likely that problems with affordability are likely to continue despite falling prices due to problems in getting mortgages that have arisen as a result of the economic climate. For those on the property ladder, a proportion of property owners may enter a negative equity situation.

## 8.8 Landscape and cultural heritage

### The current situation

#### *Landscape*

- The Cotswolds Area of Outstanding Natural Beauty (AONB) covers much of the District and is broadly co-incident with the Cotswold National Character Area. A landscape character assessment has also identified 19 landscape areas within the Cotswold AONB<sup>39</sup>. Another landscape character assessment identified a total of 38 landscape character types within Gloucester.
- The Cotswold Canals are the Stroudwater Canal and the Thames & Severn Canal. The canals corridor possesses a largely informal character. The two canals tend to bypass urban centres and the tradition of building predominantly on the towpath side ensures that the canals retain a rural or semi-rural feel, even as they pass adjacent industrial complexes. In addition to their role as recreational resource, the canal corridors represent important landscape features and have historical, architectural, nature conservation and educational value. The canals provided an historic focus for industrial activity.

#### *Cultural Heritage*

- There are forty-two Conservation Areas in Stroud District designated by the Council for their "special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance".
- There are almost five thousand Listed Buildings in the District. Of these, 41 are the highest Grade I and 201 Grade II\* Listed Buildings. Six of these important buildings are on the 'at risk' register.
- Stroud District has fourteen Parks and Gardens of Special Historic Interest.
- Stroud District contains 65 Scheduled Monuments (SMs) and other sites of archaeological importance.
- The Stroud Industrial Heritage Conservation Area (SIHCA) was originally designated to acknowledge and protect the influences that industry has had in forming the built environment, however, it is not exclusively made up of industrial buildings. Historically, domestic buildings and small residential enclaves have always been closely intermingled with the industrial environment throughout the Stroud Valleys.
- The Cotswold Canals Architectural Survey<sup>40</sup> identified a total of 554 individual canal features. Of these, 270 were recorded as observable features during the survey, and a further 284

<sup>38</sup> Office for National Statistics (2009) Stroud: Key Figures for Housing [online] available at: <http://www.neighbourhood.statistics.gov.uk/dissemination/LeadKeyFigures.do?a=7&b=6275265&c=stroud&d=13&e=7&q=6427920&i=1001x1003x1004&m=0&r=1&s=1364908007016&enc=1> (accessed 02/04/2013)

<sup>39</sup> Cotswold AONB Partnership Cotswold Landscape Character Assessment [www.cotswoldsaonb.org.uk/landscape\\_character\\_assessment/introduction.htm](http://www.cotswoldsaonb.org.uk/landscape_character_assessment/introduction.htm) [accessed 28.01.09]

<sup>40</sup> Cotswold Canals Architectural Survey (2003) available at: <http://www.cotswoldcanalsproject.org/general.asp?pid=2&pgid=179>

sites were identified from documentary sources which no longer appear to survive above ground today.

#### The likely situation in the future (assuming no intervention through the plan)

##### *Landscape*

- Within the Severn and Vale character area recent changes that have made the landscape character more 'open' are likely to continue. These changes have included the replacement of the tall trees and varied character of old orchards with the cultivation of bush forms and the low cutting of hedges.
- Development pressure in the Cotswolds character area will continue to put valued landscapes at risk.

##### *Cultural Heritage*

- Stroud District has many Conservation Areas, which suggests that much of the District's distinctive built heritage will continue to be protected from inappropriate development or smaller-scale refurbishment in future. Individual buildings outside the Conservation Areas may fare well in future, too, as indicated by the overall good condition of the most important Listed Buildings.
- The restoration of the canal should help ensure that the historic environment is preserved.

## 8.9

### Soil

#### The current situation

- 70-80% of the Gloucestershire Cotswolds area is predominated by the Jurassic limestone, which leads to a dominance of shallow "brashy" soils. The presence of the clay shales at shallow depth may lead to situations where the limestone soils are poorly drained, and at the surface leads to wet clay soils. In agriculture, this tends to explain the pattern of arable and permanent pasture, in biodiversity terms, the pattern of grassland / beech woodland with oak woodland [in a simple generalisation].
- The best most versatile agricultural land in the District is found along the north-western edge of the District. Particular concentrations are found to the north-east of Cam, to the north of Eastington and Stonehouse, and surrounding Hardwicke. A small area of such land is also found to the north of the town of Stroud.

#### The likely situation in the future (assuming no intervention through the plan)

- It is likely that on-going redevelopment in the District will result in the continuing clean-up of contaminated land. The Council is keen to promote the reuse of previously developed land, some of which will be contaminated.
- Given the priority accorded to the reuse of previously developed land, it is probable that the agricultural land resource in the District will be largely preserved.

## 8.10

### Transport and accessibility

#### The current situation

- Accessibility to both services and employment is a particularly difficult issue in a rural district such as Stroud District, where the dispersed population makes public transport less viable than in urban areas. In villages not well-served by public transport the car is often the only realistic means of access to the main town and city centres.
- Car ownership levels in Stroud District are relatively high, reflecting the rural nature of the District. A third of all households have two cars or vans, compared with the UK average of less than a quarter of all households.

- Use of public transport is low, with just over 2% travel to work by train or bus. In the South West as a whole this figure is around 4%, while in nearly 10% of people in England and Wales use public transport to get to work. Clearly this is a result of the relatively good bus and rail links to the bigger towns and cities.
- Gloucestershire County Council is responsible for the management of a network of 9,662 paths. The network is comprised of 8,448 public footpaths, 815 bridleways and 399 RUPPs/restricted byways and byways open to all traffic<sup>41</sup>.
- Through tourism and local use, the recreational path network helps the local economy to generate income for rural businesses, while functional routes – to schools, workplaces and service facilities – form an essential part of the wider highway and amenity network.

#### The likely situation in the future (assuming no intervention through the plan)

- Car ownership in the UK as a whole is rising and it is likely that this is also the case in Stroud District. Given the anticipated growth of population in the District it seems likely that the numbers of people using the roads will rise significantly in future.
- While the Cotswold Canals could, once restored, be used as a sustainable means of transport for certain classes of goods, their potential to attract new visitors to the District may well add to the amount of traffic on Stroud District's roads. Provision for sustainable access to the canals should be a high priority if net benefit in this respect is to be gained from the restoration.
- Public rights of way are likely to continue to be used to access services and amenities, especially the extensive network public footpaths.

## 8.11 Waste

### The current situation

- Stroud District Council was not in the top ten highest producers of residual waste produced however were in the top half of the league table in the South West, with 529.12 kg/household. This was the third lowest to be produced in Gloucestershire<sup>42</sup>.
- In 2009/10 Stroud District had the second lowest amount of recycling in the South West with 25.77%<sup>43</sup>.

### The likely situation in the future (assuming no intervention through the plan)

- The trend data for the amount of waste collected per head is mixed but appears to show that the amount of waste generated has now stabilised and should reduce in the future. Recycling rates are increasing, but slowly. The targets for recycling and composting of household waste in 2015 do not at present seem likely to be achieved. The Council has identified waste as an important issue and therefore it is considered likely that households will be further encouraged to address issues relating to waste in the future.

## 8.12 Water

### The current situation

- There are 16 river water bodies within Stroud District. The most recent assessment of these undertaken by the South West Observatory classified 6.3% as poor, 87.6% as moderate and 6.3% as good<sup>43</sup>.

<sup>41</sup> Gloucestershire County Council, Rights of Way and Countryside Access Improvement Plan 2011 – 2026 [online] available at: <http://www.gloucestershire.gov.uk/CHttpHandler.ashx?id=45038&p=0> (accessed 25/03/2013)

<sup>42</sup> Stroud Local Environment Profiles (2011) South West Observatory [online] available at: <http://www.swenvo.org.uk/local-profiles/gloucestershire-profiles/stroud/?locale=en> (accessed 25/03/2013)

<sup>43</sup> Stroud Local Environment Profiles (2011) South West Observatory [online] available at: <http://www.swenvo.org.uk/local-profiles/gloucestershire-profiles/stroud/?locale=en> (Accessed 25/03/2013)

- Much of Stroud District has been classified as a Nitrate Vulnerable Zone (NVZ), meaning that it is land that drains into nitrate polluted waters, or is close to waters that could become polluted by nitrates. NVZ are classified as such when the waters exceed or are at risk of exceeding the EU limit of 50mg/NO<sub>3</sub>/l.
- The Stroud District SFRA published in 2012 identifies areas to be at a significant/predominantly significant risk of flooding in the flood plains of the River Frome, River Cam and within the Sharpness area. Within the Quedgeley area the flood hazard classification is considered sufficiently low that development could go ahead provided the Sequential Test is passed and due guidance followed.<sup>44</sup>

The likely situation in the future (assuming no intervention through the plan)

- As a result of climate change, flood risk in the District is likely to increase with an increase in the depth of flooding of floodplains in the south and east areas and increased storm surges and wave heights in the Severn Estuary and its tributaries. In addition, more intense storm events as a result of climate change could lead to an increase in surface water flooding and flash flooding.
- Due to the likelihood of more droughts and water scarcity as a result of climate change water efficiency is fundamental for inclusion in future new developments in Stroud District.

---

<sup>44</sup> SFRA (2012) Stroud District Council Strategic Flood Risk Assessment for Local Development Framework Level 2 Final Report [online] available at: [http://www.stroud.gov.uk/info/plan\\_strat/Level\\_2\\_SFRA.pdf](http://www.stroud.gov.uk/info/plan_strat/Level_2_SFRA.pdf) (Accessed 28/03/2013)

## 9 WHAT ARE THE KEY ISSUES THAT SHOULD BE A FOCUS OF THE APPRAISAL?

### 9.1 Introduction

9.1.1 The following is a list of sustainability objectives that should be a particular focus of SA. These reflect the sustainability context and baseline and have been agreed through consultation. These objectives provide a methodological framework for the appraisal of likely significant effects on the baseline.

### 9.2 Sustainability topics / objectives

#### Air

- To ensure that air quality continues to improve.

#### Biodiversity

- Create, protect, enhance, restore and connect habitats, species and/or sites of biodiversity or geological interest.

#### Climate change mitigation

- To implement energy efficiency through building design to maximise the re-use of land and buildings, recycle building materials and use renewable sources of energy.
- To implement strategies that help mitigate global warming and adapt to unavoidable climate change within the District.

#### Community and wellbeing

- To meet the challenge of a growing and ageing population.
- To encourage social inclusion, equity, the promotion of equality and a respect for diversity.
- To maintain and improve the community's health with accessible healthcare for residents.
- To increase levels of physical activity, especially among the young.
- To reduce crime and anti-social behaviour.
- To provide access to the countryside and appropriate land for leisure and recreation use.

#### Economy and employment

- To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.
- To develop the local economy within its environmental limits.
- To maintain and enhance employment opportunities within the District to meet both current and future needs.

#### Housing

- To provide affordable and decent housing to meet local needs.

#### Landscape and cultural heritage

- To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of the built and cultural heritage.
- To conserve and enhance landscapes and townscapes.

#### Soil

- To protect and enhance soil quality.

#### Transport and accessibility

- To promote traffic reduction and encourage more sustainable alternative forms of transport.
- To restore, manage and promote the canal towpaths as part of the sustainable transport infrastructure.

#### Waste

- To minimise the amount of waste produced, maximise the amount of material that is reused or recycled, and seek to recover energy from the largest proportion of the residual material.

#### Water

- To maintain and enhance the quality and quantity of ground and surface waters.
- To manage and reduce the risk of flooding in new and existing development.

**PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?**

## 10 INTRODUCTION (TO PART 2)

- 10.1.1 Within the SA Report published for consultation alongside the draft plan it will be possible (indeed essential) to tell a detailed 'story' about the interaction between plan-making and SA that has preceded and influenced the preparation of the draft plan. As part of the 'story', it will be important to explain how the SA findings presented within this Interim SA Report have been taken into account.
- 10.1.2 At the current time the 'story' that it is possible to tell about the influence of SA up to this point is more limited. There has been one plan-making / SA iteration, as described below.

## 11 SA OF ALTERNATIVE DEVELOPMENT STRATEGIES (2012)

- 11.1.1 An Interim SA Report was presented alongside the Council's 2012 'A Preferred Strategy for shaping the future of Stroud District' consultation document. The Interim SA Report presented an appraisal of eight alternative Development Strategies -
- Strategy A – Growth Point Strategy.
    - 2,000 dwellings concentrated at either Cam, Eastington, Sharpness or west of Stonehouse. Employment and business premises would be integrated with new dwellings as mixed used development. Indicative floorspace provision would be for 46,240 sqm general industrial, 19,000 sqm general office, 50,000 sqm warehousing and distribution and 12,000 sqm retail and leisure.
  - Strategy B – Concentrated Development Strategy.
    - 1,000 dwellings concentrated at two or more of the following settlements: Cam, Eastington, Sharpness, west of Stonehouse, Brimscombe or Whitminster. Employment and business premises would be integrated with new dwellings as mixed used development. Indicative floorspace provision at each of the settlements would be for 23,800 sqm general industrial, 9,050 sqm general office, 25,000 sqm warehousing and distribution and 6,000 sqm retail and leisure.
  - Strategy C – Cluster Strategy.
    - 200 to 250 dwellings to be located in eight settlements, each serving a rural hinterland. Indicative floorspace provision for employment at each of the eight settlements would be for 2,975 sqm general industrial, 1,187.5 sqm general office, 3,125 sqm warehousing and distribution and 750 sqm retail and leisure.
  - Strategy D – Stroud Valleys Strategy.
    - 200 dwellings each in three locations and the remaining 1,400 dwellings to be located within a variety of smaller sites within the Stroud valleys. There would be a particular focus upon canal corridor regeneration sites. Indicative floorspace provision for employment would be for 4,760 sqm of general industrial at each of the 200 dwelling settlements and smaller sites providing 23.8 sqm per dwelling. General office floorspace provision would be for 1,900 sqm at each of the 200 dwelling settlements and smaller sites providing 23.8 sqm per dwelling. The 200 dwelling settlements would provide 5,000 sqm of warehousing and distribution with smaller sites providing 25 sqm per dwelling. Retail and leisure provision would be for 1,200 sqm at each of the 200 dwelling settlements and smaller sites providing 6 sqm per dwelling.
  - Strategy E – Rural Combination Strategy.
    - 1,000 dwellings to be located at either Cam, Eastington, Brimscombe, west of Stonehouse, Sharpness or Whitminster; and 100 dwellings or less to be located at a minimum of ten locations, dispersed across the District to support smaller towns and villages. Towns and villages selected for development should have a 3rd tier status or above in terms of accessibility. Indicative floorspace provision for employment would be for 23,800 sqm at each of the 1,000 dwelling settlements and then 1190 sqm at

each of the 10 locations accepting 100 dwellings or less. General office floorspace provision would be for 9,050 sqm at each of the 1000 dwelling settlements and 475 sqm at each of the 10 settlements. The 1000 dwelling settlement would provide for 25,000 sqm of warehousing and distribution with a further provision of 1,250 sqm being provided at each of the 10 settlements. Retail and leisure provision would be for 6,000 sqm at the 1000 dwelling settlement and 500 sqm at each of the 10 settlements.

- Strategy F – Dispersal Strategy.
  - Residential development would be distributed across at least twenty five sites in a wide range of the District's parishes. Each location would accommodate 50 – 100 dwellings. The towns and villages selected for development should have 4th tier status or above in terms of accessibility. Employment floorspace provision would be similarly dispersed with each of the twenty five sites. At each of the locations there would be 2,380 sqm general industrial, 550 sqm general office, 2,500 sqm warehousing and distribution and 600 sqm retail and leisure.
- Strategy G – Rural Community Strategy.
  - Residential development will be located over a wide range of small sites distributed across the District's parishes. At least 40 sites of 10 to 50 dwellings will be allocated. The locations for development could be in settlements which fall in any of the five tiers including those with 5th tier status. Employment floorspace will be similarly dispersed through settlements in the District. Each of the 40 locations would receive indicative floorspace of 1,156 sqm general industrial, 475 sqm general office, 1250 sqm warehousing and distribution and 300 sqm retail and leisure.
- Strategy H – Hybrid Strategy of A, B and D.
  - 1,000-1,500 dwellings to be located west of Stonehouse; Stroud Valleys (various sites): 300 - 800 dwellings; North East of Cam: 200 - 500 dwellings; Hunts Grove extension: 500 - 750 dwellings; Aston Down: 100 - 200 dwellings; Sharpness: 200 - 250 dwellings. Other Towns and Parishes who have suggested that they are prepared to take housing will be asked to identify sites and numbers. Indicative employment provision would be such that there would be an intensification of employment uses at Aston Down and Sharpness and the provision of up to 3,000 jobs west of Stonehouse, up to 1,600 jobs in the Stroud Valleys and up to 1,500 jobs north east of Cam.

11.1.2 The Council is still yet to determine a preferred Development Strategy. It is expected that a decision will be made in 2013. This decision will be made taking into account the findings of the alternatives SA.

**PART 3: WHAT ARE THE SA FINDINGS AT THIS STAGE?**

## 12 INTRODUCTION (TO PART 3)

12.1.1 This 'Part' of the SA Report presents an appraisal of 'the emerging draft plan approach as we understand it at the current time', i.e. at the time of the March 2013 'Policies' consultation. It is important to note that, whilst the 'Policies' consultation document presents a range of 'Core' and 'Delivery' policies, it does not present a preferred 'Development Strategy', nor does it present policy on site allocations.

### 12.2 Methodology

12.2.1 The aim is to identify, describe and evaluate 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see Part 1 of the main report) as a methodological framework.

12.2.2 In practice, there is little potential to predict significant effects given that the Development Strategy is currently unknown.<sup>45</sup> However, it is possible to comment on the merits of the Core and Delivery policies in more general terms. The other appraisal 'challenge' relates to limited understanding of the baseline (in particular the 'future baseline'). There is a need to make assumptions, and where this is the case an explanation of the assumptions made is provided. It is also important to note that effects are predicted taking into account a range of 'effect characteristics', as is required by the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered.

---

<sup>45</sup> It is important to note that the SEA Directive / Regulations do not envisage that there should be an appraisal of policies in isolation. Rather, there is a need to appraise (i.e. 'identify, describe and evaluate' the likely significant effects of) *the draft plan* (and reasonable alternatives). Our understanding of the 'draft plan' approach is currently very limited, and hence there is limited potential to predict significant effects.

## 13 APPRAISAL FINDINGS

### 13.1 Air & soil quality

#### Relevant sustainability objectives:

- To ensure that air quality continues to improve.
- To protect and enhance soil quality.

#### Relevant plan policies:

- *Homes and communities* – **CP8** (New housing development); **HC4** (Local housing need: exception sites);
- *Economy and infrastructure* – **CP11** (New employment development); **CP13** (Demand management and sustainable transport measures); **EI6** (Protecting individual and village shops, public houses and other community uses); **EI2** (Promoting transport choice and accessibility); **EI13** (Protecting our cycle routes); **EI14** (Provision and protection of rail stations and halts)
- *Environment and surroundings* – **CP14** (High quality sustainable development); **ES5** (Air Quality)

#### Appraisal

- 13.1.1 Whilst the level and location of development to be brought forward through the Development Strategy is currently uncertain, it is likely that it will have implications in terms of air and soil quality, particularly if a higher growth approach is to be followed. Meanwhile, it is possible to comment on how the negative impacts of any future development will be mitigated and any positive effects of development enhanced as a result of the Core / Delivery policies outlined.
- 13.1.2 The approach set out in **Policy ES5** establishes that any development proposals that are likely to exacerbate existing areas of poor air quality will need to demonstrate that measures can be taken to effectively mitigate emission levels. This should help to ensure that the District's air quality does not deteriorate in light of new development.
- 13.1.3 Levels of car use in the District are currently high, which has negative implications in terms of air quality. Therefore, the support offered to public transport, walking and cycling through a number of the plan policies is likely to bring about positive effects. In particular, **Policy CP13** will ensure that planning permission is granted to those schemes that result in improvements to the existing infrastructure network, including rail and public transport, plus facilities for pedestrians and cyclists. This approach to sustainable transport infrastructure is supported by the Policy **EI12** which calls for new developments where appropriate to connect to surrounding infrastructure and to contribute towards new or improved walking, cycling and rail facilities and the provision of an integrated public transport network; and through **Policy EI13** which looks to see existing and planned cycling routes protected.
- 13.1.4 Focusing new development on brownfield land could help to ensure that the District's best and most versatile agricultural land is protected from development. In addition, such an approach would maximise the potential for new development to contribute to improving soils that are contaminated. At present promoting the use of brownfield land is featured as a consideration under Strategic Objective Five (Climate change and environmental limits). However, there is no policy support for this objective. In order to ensure that gains are made in terms of protecting and enhancing soil quality the prioritisation of brownfield sites should be noted, potentially in **Policy CP14** and / or through a standalone policy.
- 13.1.5 Other policies that could have implications for air quality include:
- Policy CP8 notes that new housing development must be accessible by public transport, bicycle and foot, with positive implications for air quality

- Policy HC4 calls for affordable housing adjoining settlement development limits to be accessible to public transport and services and so may result in positive effects on air quality
- Policy CP11 looks to ensure that industrial or business development is readily accessible by public transport, bicycle and foot and so may lead to positive effects in terms of air quality
- Policy EI6 will allow the loss of community facilities only when adequate similar use facilities are accessible by walking or cycling (within 800m), with positive implications for air quality
- Policy EI14 looks to protect existing rail facilities from development and permit opening of passenger stations where feasible, and so may result in positive effects on air quality
- Policy CP14 calls for the provision of safe, convenient access to development by sustainable means of transport, with positive implications for air quality

#### Conclusions & recommendations

- 13.1.6 In conclusion, the preferred approach to Core / Delivery policies should have the effect of mitigating negative effects of development in terms of air quality. Most likely, given the fact that baseline conditions are currently non-problematic, this will be to the extent that significant negative effects associated with the Development Strategy (regardless of the level or location of strategic growth) can be avoided.
- 13.1.7 In contrast, the protection and enhancement of soil quality is less likely to be ensured without the addition of policy supporting the prioritisation of brownfield sites. Risks to soil would be higher under a high growth scenario.
- 13.1.8 The following recommendation is made:
- In-line with the NPPF requirement to encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value, ensure that Policy CP14 gives weight to brownfield development over that occurring on greenfield.

## 13.2 Biodiversity

### Relevant sustainability objectives:

- Create, protect, enhance, restore and connect habitats, species and/or sites of biodiversity or geological interest.

### Relevant plan policies:

- *Homes and communities* – **CP8** (New housing development); **HC1** (Meeting small-scale housing need within defined settlements)
- *Economy and infrastructure* – **CP11** (New employment development); **EI4** (Development on existing sites in the countryside); **EI10** (Provision of new tourism opportunities); **EI11** (Promoting sport, leisure and recreation)
- *Environment and surroundings* – **CP14** (High quality sustainable development); **ES2** (Renewable or low carbon energy generation); **ES6** (Providing for biodiversity and geodiversity); **ES8** (Trees, hedgerows and woodlands); **ES11** (Restoring and regenerating the District's canals); **ES12** (New and better design of places); **ES14** (Provision of semi-natural and natural greenspace with new development)

### Appraisal

- 13.2.1 The District contains a range of wildlife sites, from local to international significance, in addition to non-protected areas of importance to biodiversity in the wider landscape, such as wildlife corridors. New development in the District could impact upon landscapes that support biodiversity both directly (e.g. through loss of habitat) and indirectly (e.g. through pollution). As a result, the scale, type and location of the development brought forward through the Development Strategy may have significant implications for the District's biodiversity. Whilst the Development Strategy remains uncertain, it is possible to comment on how the negative impacts of any future development in the District may be mitigated and any positive effects of development enhanced as a result of the Core / Delivery policies outlined.
- 13.2.2 The approach set out in **Policy ES6** notes that: development is not to lead to adverse effects on international sites, whether alone or in combination; that other designated sites will be protected unless the benefits of new development outweigh nature conservation or scientific interest; and that new development is to conserve and enhance the natural environment, including all sites of ecological or geological value, with legally protected species to be safeguarded. These measures should help to ensure that positive effects are achieved against the baseline, although new development could still result in a net loss in biodiversity at the District-scale by the end of the plan period (given the assumption that biodiversity considerations will not always be a priority). As such, an inclusion of a requirement for biodiversity offsets to ensure no net loss (and ideally net gain) of biodiversity in developments over a certain threshold size would helpfully strengthen the policy.
- 13.2.3 The approach outlined in **Policy EI14** addresses the potential impacts of proposals for the extension of buildings on existing employment sites in the countryside. Such proposals are expected to include measures to secure environmental improvements such as landscaping and biodiversity, with positive implications. A similar explicit recognition of the need to provide environmental enhancements could be incorporated into a number of plan policies and would reinforce Policy ES6's approach to 'new development and biodiversity'. For instance **Policy CP11** could be strengthened by calling for industrial or business developments to result in environmental protection and enhancement, including in terms of biodiversity and green infrastructure.

- 13.2.4 The approach towards tourism development outlined in **Policy EI10** has positive implications as it calls for proposals to carefully consider the protection of environmentally sensitive sites and not detract from any acknowledged biodiversity interest. In contrast, the promotion of sport, leisure and recreational facilities through **Policy EI11** includes no mention of environmental considerations in its criteria for permission. Such an omission could lead to negative effects on biodiversity and missed opportunities for enhancement (e.g. golf courses).
- 13.2.5 Focusing new development on brownfield land may help to relieve development pressure that would otherwise fall upon greenfield, biodiversity rich sites (although it should be noted that brownfield sites can also have significant biodiversity value). At present promoting the use of brownfield land is featured as a consideration under Strategic Objective Five (Climate change and environmental limits). However, there is no policy support for this objective. In order to ensure that gains are made in terms of protecting and enhancing biodiversity the prioritisation of brownfield sites should be noted, potentially in **Policy CP14** and / or through a standalone policy.
- 13.2.6 Other policies that could have implications for biodiversity include:
- Policy CP8 may represent a missed opportunity to support biodiversity as it refers only to ‘appropriate landscaping’, with no mention of the wider benefits that could be achieved through an ecologically focused approach to such landscaping.
  - Policy HC1 requires that small-scale housing within defined settlements does not result in loss of open space when it affects local character, but does not reference biodiversity
  - Policy CP14 notes that development will be supported where it retains important landscape features, such as those of nature conservation interest, and so should lead to positive effects
  - Policy ES2 is likely to result in positive effects for this topic as it takes into account the impact that renewable and low carbon schemes could have on biodiversity
  - Policy ES8 looks to ensure that development does not adversely affect protected trees , hedgerows and woodlands and so is likely to result in positive effects on biodiversity
  - Policy ES9 sets out that any development adjacent to a canal should relate to the biodiversity interest of that area, with positive implications
  - Policy ES12 calls for good design in terms of landscaping; there is the potential for this approach to be strengthened by requiring a consideration of green infrastructure
  - Policy ES14 requires that greenspace includes biodiversity interest, with positive implications for wildlife

#### Conclusions & recommendations

- 13.2.7 In conclusion, the preferred approach to Core / Delivery policy should have the effect of mitigating to some extent the negative effects of the Development Strategy, although such mitigation measures appear unlikely to lead to no net loss in biodiversity without efforts to employ biodiversity offsetting (particularly in a high growth scenario) due to the limitations of onsite enhancement (in terms of the potential to contribute to biodiversity at wider scales) and the cumulative effects of development. The positive effects of the Core and Delivery policies in terms of protection of biodiversity on development sites could meanwhile be improved upon by emphasising the role that enhancements to biodiversity can play in terms of the provision of ‘ecosystem services’, including as part of a planned approach to ‘green infrastructure’).
- 13.2.8 The following recommendations are made:
- Strengthen Policy ES6 by making provision for biodiversity offsets to ensure no net loss of biodiversity at the District scale
  - The approach outlined in Policy CP11 could be strengthened by calling on proposals to result in environmental enhancements, including to biodiversity and green infrastructure

- Integrate biodiversity into Policy CP8 by making explicit the need to provide environmental enhancements, including green infrastructure and areas for wildlife
- Include considerations of green infrastructure as an element of good design in Policy ES12
- Incorporate biodiversity considerations into Policy HC1 by requiring that small-scale housing within defined settlements does not result in the loss of open space of value for wildlife
- Include considerations of the environmental impacts and opportunities (including biodiversity and green infrastructure) of new sports, leisure and recreation facilities into Policy EI11
- Ensure that policy gives weight to brownfield development over that occurring on Greenfield by incorporating it in Policy CP14 and / or a standalone policy.

### 13.3 Climate change mitigation

#### Relevant sustainability objectives:

- To implement energy efficiency through building design to maximise the re-use of land and buildings, recycle building materials and use renewable sources of energy.
- To implement strategies that help mitigate global warming and adapt to unavoidable climate change within the District.

#### Relevant plan policies:

- *The Development Strategy* - **CP1** (Presumption in favour of sustainable development); **CP3** (Settlement hierarchy); **CP4** (Place making); **CP5** (Environmental development principles for strategic sites)
- *Homes and Communities* - **CP8** (New housing development); **DP HC6** (Residential sub-division of dwellings)
- *Economy and Infrastructure* - **CP11** (New employment development); **DP EI12** (Promoting transport choice and accessibility)
- *Our environment and surroundings* - **CP14** (High quality sustainable development); **DP ES1** (Contributing to a low carbon future); **DP ES2** (Renewable or low carbon energy generation); **DP ES12** (New and better design of places)

#### Appraisal

- 13.3.1 Until it becomes possible to effectively decouple development<sup>46</sup> and carbon emissions, development is likely to result in increased emissions and consequential effects on climate change. However, the Plan does have some scope to 'mitigate' climate change through the design of development as well as by helping guide more sustainable transport patterns and supporting renewable energy generation. It can also ensure new development is resilient to the increasing severity of future climate change and look to ensure that the District is able to 'adapt' more generally (a matter that is considered under other topics).
- 13.3.2 As a rural location Stroud District has relatively high emissions per capita, in part as a consequence of high car ownership and older low density building stock. Opportunities to mitigate carbon emissions through low carbon design and greater deployment of renewable energy technologies of all scales could help mitigate local carbon impacts.
- 13.3.3 A number of core policies are proposed that could have an effect on the climate related issues. **Policy CP1's** presumption in favour of sustainable development is notably pro-development unless material considerations indicate otherwise. Depending on the nature of development this has the potential for both significant adverse (development located in areas inaccessible by sustainable transport modes) as well as positive effects (renewable energy projects). **Policies CP3, CP4 and CP5** seek to focus and capitalise on opportunities to encourage development in areas with existing public transport infrastructure. These policies also aim to reduce car dependency within communities by both encouraging greater walking and cycling and by allowing development in these communities if required to meet specific needs. In particular **Policy CP5** (strategic sites) and **CP8** (new housing development) both include specific requirements that sites and development will be readily accessible by public transport and that development must minimise energy consumption and incorporate sustainable construction techniques. Both policies identify the need for on-site low or zero carbon energy generation and are thus likely to have positive effects.

<sup>46</sup> Not including carbon negative activities including renewable energy development.

- 13.3.4 **Policies CP11 and CP14** are also likely to have a positive effect on addressing the identified climate issues, however, to a lesser extent than policies detailed above. Policy CP14 includes no reference to the importance of low carbon and renewable energy generation and is weakly worded regarding the need to ensure the development is located close to existing public transport infrastructure.
- 13.3.5 Delivery **Policies ES1 and ES2** focus on encouraging sustainable construction techniques and renewable energy generation. Policy ES2's particular recognition that renewable or low carbon sources should be considered in light of their need for "effective operation" is good; however, due to the policy's strong protective wording for landscape character and visual amenity etc. the likelihood of significant positive effects is tempered somewhat. The policy's indication that renewable and low carbon development can only have adverse impacts and the requirement for "rigorous assessment" of wind developments could possibly discourage applications and stymie significant development opportunities. Ultimately, this policy could potentially mean that the Plan has significant negative effects in terms of the sustainability objective of mitigating climate change.
- 13.3.6 Delivery **Policy ES12** focuses on new and better design of places and aims to ensure that new development is designed to offer flexibility for future needs and uses. However, the extent to which this policy will ensure new development will be resilient to the impacts of future climate change is unclear.
- 13.3.7 It is also worth noting the following policies may also have implications for climate issues, albeit to a lesser extent:

- Policy DP E112 Promoting transport choice and accessibility

#### Conclusions & recommendations

- 13.3.8 The preferred approach to Core / Delivery policy is likely to ensure that development is designed with minimising carbon emissions in mind. Policy will also ensure to seek to ensure good access to public transport, albeit in a District where provision is generally relatively poor. However, it is not possible to conclude that the Plan is on-track to support reduced car dependency without knowledge of the Development Strategy (particularly given that Stroud is a rural District where reducing car dependency is a challenge).
- 13.3.9 There is some concern raised regarding the potential for policy to result in negative effects as a result of placing constraints on renewable low carbon energy infrastructure.
- 13.3.10 The following recommendations are made:
- CP14 should include the requirement for on-site renewable energy generation.
  - CP14 should be strengthened to ensure development has good transport links to the wider public transport network, not only to nearby services.
  - ES2 should recognise that renewable and low carbon sources can also have positive impacts on users and residents of the local area.
  - It is recommended that Policy ES2 is reworded such that wind turbine proposals should be subject to an "appropriate level of" rather than "rigorous" assessment.
  - ES12 could include reference to the need for new development to also be designed to be resilient to future climate change.

## 13.4 Community & wellbeing

### Relevant sustainability objectives:

- To meet the challenge of a growing and ageing population.
- To encourage social inclusion, equity, the promotion of equality and a respect for diversity.
- To maintain and improve the community's health with accessible healthcare for residents.
- To increase levels of physical activity, especially among the young.
- To reduce crime and anti-social behaviour.
- To provide access to the countryside and appropriate land for leisure and recreation use.

### Relevant plan policies:

- *Homes and communities* – **CP7** (Lifetime Communities); **CP9** (Affordable Housing); **CP10** (Gypsy, Traveller and Travelling Showpeople Sites); **HC1** (Meeting small-scale housing need within defined settlements); **HC4** (Local housing need: exception sites); **HC7** (Annexes for dependents or carers)
- *Economy and infrastructure* – **CP13** (Demand management and sustainable transport measures); **EI6** (Protecting individual and village shops, public houses and other community uses); **EI11** (Promoting sport, leisure and recreation); **EI12** (Promoting transport choice and accessibility); **EI13** (Protecting our cycle routes)
- *Environment and surroundings* – **CP14** (High quality sustainable development); **ES12** (New and better design of places); **ES13** (Protection of existing open space); **ES14** (Provision of semi-natural and natural greenspace with new development); **ES15** (Provision of outdoor play space)

### Appraisal

- 13.4.1 The Development Strategy will have implications for community and wellbeing as the level and location of significant development in the District will determine the extent to which existing community facilities and spaces are put under pressure and will influence the extent to which issues relating to determinants of wellbeing, such as access to suitable housing, are addressed. Whilst the Development Strategy remains uncertain, it is possible to comment on how the negative impacts of any future development on community and wellbeing in the District will be mitigated and any positive effects of development enhanced as a result of the Core / Delivery policies outlined.
- 13.4.2 The population of the Stroud District is forecast to grow over the plan-period, and to shift demographically towards increasing old age in an area which already features a higher proportion of people in the older age groups (45 years and upwards). As such, **Policy CP7's** approach to ensuring that all major development (over 10 dwellings or more, plus community facilities) will be required take into account identified long-term needs in the District (including the needs of an ageing population in terms of design, accessibility, and services) is welcomed. In addition, Policy CSP7 calls for the needs of minorities, those with children, young people and families, and those with disabilities to be taken into account in development proposals. This focus on meeting the long term identified needs of those in the District should help to ensure that positive effects are achieved over the plan period.
- 13.4.3 Similar positive effects in this respect may also occur as a result of **Policy ES12**; this calls for new development to be designed to offer flexibility for future needs (so taking into account demographic and other changes) and for socially integrated development which supports community activity.

- 13.4.4 Meeting identified needs in terms of housing is another important element of the plan. In this regard, **Policy CP10**'s approach to Gypsy and Travellers sites should ensure that existing sites are safeguarded and that when required new sites are situated in suitable locations in terms of local amenities and services, with positive implications for health and wellbeing.
- 13.4.5 The demand for affordable housing in the District is expected to grow over the next 20 years, The provision of affordable housing on new development at 30% or financial contributions (where viable) through **Policy CP9** may help to address some of this demand. However, it is noted in the supporting text that 30% represents a low threshold, with this being deemed appropriate due to high levels of housing need generally and a limited supply of land for housing. It is therefore considered to be unlikely that this policy approach will be able to fully address the impact on wellbeing that a lack of access to suitable housing can have, and the displacement it can result in (e.g. having to live away from work and family); as such it is suggested that significant negative effects could occur against the baseline.
- 13.4.6 Levels of car use in the District are currently high, which potentially has negative implications in terms of health and wellbeing. Therefore, the support offered to walking and cycling through a number of the plan policies is likely to bring about positive effects. In particular, **Policy CP13** will ensure that planning permission is granted to those schemes that result in improvements to the existing infrastructure network, including facilities for pedestrians and cyclists. This approach to cycling and pedestrian infrastructure is supported by the **Policy EI12** which calls for new developments to connect, where appropriate, to surrounding infrastructure and to contribute towards new or improved cycling and rail facilities; and through **Policy EI13** which looks to see existing and planned cycling routes protected.
- 13.4.7 Health and wellbeing related benefits are likely to occur through new sports, cultural, leisure and recreational facilities, the delivery of which is supported through **Policy EI11**. This policy approach also looks to ensure that such facilities have adequate cycling and walking links and are accessible to those who are disabled, and so should be capable of providing benefits. In relation to recreation and leisure, **Policy ES13** should also result in positive effects as it will ensure that development proposals do not lead to the whole or partial loss of open spaces without an assessment of the current level of provision, and the creation of a suitable replacement facility where necessary. This latter policy is supported by **Policy ES14** which looks to ensure that residential developments are accompanied by accessible greenspace and by **Policy ES15** which calls for new development to provide appropriate public outdoor play space.
- 13.4.8 Stroud District is considered to be a relatively low crime area in comparison to South West or England averages. However, some issues exist, such as youth crime which is high by County levels. In terms of crime, **Policy CP14** calls for new developments to feature designs and layouts that assist crime prevention and community safety and so should result in positive effects. This approach is also emphasised in **Policy ES12**, which calls for secure by design principles to be adopted in new development.
- 13.4.9 Other policies that could have implications for communities and well-being include:
- Policy HC1 seeks to ensure that appropriate levels of private amenity space are provided in residential developments (or redevelopments) within defined settlements, with positive implications for health and well being
  - Policy HC7 supports the creation of annexes on existing properties outside defined settlements where there is a clear requirement for such development to meet the needs dependents or carers, with likely positive effects given the Districts ageing population.
  - Policy HC4 will look to ensure that housing sites outside of defined settlements have access to local services and so should result in positive effects on community and wellbeing
  - Policy EI6 looks to ensure that community uses are only lost where there is no prospect of continued community use or viability, or where there are adequate similar facilities within easy reach and so should result in positive effects

**Conclusion & recommendations**

- 13.4.10 In conclusion, the preferred approach to Core / Delivery policies should have the effect of mitigating the negative effects of the Development Strategy in terms of community & wellbeing, and should to some degree help to ensure that the positive effects of growth are realised / maximised. However, the policies could be strengthened to ensure that those with the most acute housing needs are supported.
- 13.4.11 The following recommendations are made:
- Consider means of increasing the threshold for affordable housing provision set out in policy CP9 in order to better meet local requirements for such dwellings
  - Policy ES14 should be adjusted to specify the size of natural greenspace accessible within 300m in order to maximise community and wellbeing gains

## 13.5 Economy and employment

### Relevant sustainability objectives:

- To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.
- To develop the local economy within its environmental limits.
- To maintain and enhance employment opportunities within the District to meet both current and future needs.

### Relevant plan policies:

- *Economy and infrastructure* – **CP11** (New employment development); **CP12** (Town centres and retailing); **EI1** (Key employment sites); **EI2** (Regenerating existing employment sites); **EI3** (Small employment sites [outside identified employment areas]); **EI4** (Development on existing employment sites in the countryside); **EI5** (Farm enterprises and diversification); **EI7** (Non-retail uses in primary frontages); **EI8** (Non-retail uses in secondary frontages); **EI9** (Floorspace thresholds for Impact Assessments); **EI10** (Provision of new tourism opportunities) and **EI15** (Protection of freight facilities at Sharpness Docks).

### Appraisal

- 13.5.1 At this stage of plan-making the Development Strategy is unknown. The level of growth planned for in the District will play a vital role in achieving growth in the local economy and economic activity. Under a high-growth scenario, this could have a significant positive effect on the economy and employment, contributing to new employment opportunities, shops, services and facilities; whereas a low-growth scenario would likely have less of a significant effect, but a positive one nonetheless. It should be noted that there is the potential situation that too high a level of growth could lead to negative effects in terms of other objectives in the District, such as the environment and local character, which could reduce the District's appeal in terms of attracting businesses and tourists.
- 13.5.2 Whilst the Development Strategy remains uncertain, it is possible to comment on how the Core and Delivery policies will help to ensure that the positive effects of the Development Strategy (in terms of 'Economy and employment') are maximised, and any negative effects avoided or mitigated.
- 13.5.3 The policies are likely to ensure that the Local Plan leads to significant positive effects for the economy and employment at the District scale. Benefits are likely to be focused in the larger urban areas, although the policies would also benefit 'the rural economy' including through helping to ensure facilities and accommodation for tourism. The approach taken seeks to lock in the benefits of growth and ensure that growth in one location does not undermine the role and function of other locations, through adhering to the settlement and retail hierarchies.
- 13.5.4 Residents of Stroud District are better-paid than the regional average, however a large number (and the best paid) work outside of the District. Delivering increased employment in the District, including in service-based and creative industries, should help to retain better paid staff in the District, reduce out-commuting and increase self-containment. This should in turn have knock-on benefits for local spending and the number and types of shops and services that can be sustained in the District.
- 13.5.5 As such **Policy CP11** seeks to address the decline in manufacturing and to capitalise on the growth experienced locally in creative and service industries. The policy enables the reuse, refurbishment and development of sites which could encourage new businesses to the area whilst intensifying the number of jobs on employment sites. With more people working in the District this should boost the local economy in terms of spending on retail and leisure.

- 13.5.6 Key employment sites are listed at **Policy EI1**. This policy seeks to retain B class uses which achieve 'demonstrable economic enhancement'; and does not allow changes of use to non-B class uses. This should help facilitate economic growth by safeguarding the most important sites for economic and employment purposes. In addition, **Policy EI2** allows the regeneration of listed existing non-key employment sites to provide mixed use developments "provided that... leads to investment that provides greater employment opportunities for the local community".
- 13.5.7 **Policy EI3** allows employment sites outside of employment areas to be redeveloped to housing providing that there is no net loss in employment opportunities; and **Policy EI15** seeks to support the viability of Sharpness docks in handling freight and undertaking shipping repairs. As such, in terms of the employment land policies; there should be no net loss and a net gain in employment opportunities, as well as a shift towards higher paid sectors.
- 13.5.8 In terms of town centres and retailing, **Policy CP12** seeks to maintain and enhance existing provision and provide an appropriate range of facilities and services; provide opportunities for commercial development including retail and leisure; improve and enhance vitality and viability; and improve the links between employment, shopping and services to encourage greater local spending.
- 13.5.9 **Policy CP12** does not allow development on a scale which could undermine the role and function of settlements according to the retail hierarchy. The greatest development would be directed to the largest settlements which are generally better connected in terms of transport, which could help facilitate local spending. Additionally, improving retail and leisure provision would likely enhance the appeal of the area for tourists, providing development takes place that is 'in character' with the area. **CP12** is supported by **Policies EI7** and **EI8** which seek to preserve the provision of A Class uses in primary and secondary frontages respectively. This should be sufficient to sustain the retail role and function of settlements in the District.
- 13.5.10 **Policy EI9** sets the floorspace thresholds for impact assessment according to the retail hierarchy; preventing adverse impacts on existing retail provision. This policy should preserve the role and function of settlements in the District; however it is considered that by setting an arbitrary threshold, developments just underneath the threshold could lead to adverse effects but not require an assessment. It is considered that the LPA should consider adding a caveat that "the council may request an impact assessment on proposals lower than these thresholds if it feels that such proposals may lead to adverse impacts on the vitality and viability of existing provision in the District". By allowing themselves flexibility over the requirement for an impact assessment, the council would be able to ensure that instead of "generally" (supporting text) not resulting in adverse impacts, there is greater certainty over preventing unacceptable impacts.
- 13.5.11 **Policies EI4** and **EI5** cover the countryside, farms and diversification respectively. EI4 allows, in principle, the extension of employment sites in rural areas providing it meets criteria; one of which is to facilitate the retention or growth of local employment opportunities. EI5 allows (subject to criteria) farm diversification where it would help to support (rather than replace) farming activity. Farming is traditionally an important industry in the District, and this policy would allow farmers to continue to farm but also allow them to earn income from other streams, increasing their economic resilience and income prospects.

13.5.12 Tourism development is covered by **Policy EI10** which allows (subject to criteria) tourism development (including attractions and accommodation) within the first two tiers of settlements in the District. This would likely boost tourism activity in the most accessible locations with the greatest range of retail and leisure provision. It is considered that **Policy EI10** could be strengthened by including reference to the need for development to be within the settlement boundary; and for proposals to take into account effects on townscape (currently the policy only specifies 'landscape' and 'environmental sensitive sites'). Together these improvements would encourage the efficient use of land; boost retail and leisure spend in sustainable locations; and also prevent development from harming townscape and heritage assets (which in themselves are tourist attractions).

13.5.13 It is also worth noting that a number of other policies could have implications for economy and employment, albeit to a lesser extent. These policies include:

- Policy HC1 and HC2 seek to meet small-scale housing need within defined settlements and above shops respectively. New housing in sustainable locations could benefit economic growth by increasing the size of the workforce in the District and the quality and affordability of housing; potentially attracting businesses to the area.
- Policy EI16 seeks to improve public transport provision. This could improve accessibility to work for employees as well as encourage people to travel and spend money within the local economy.
- Policy ES11 seeks to restore and regenerate the District's canal network. This could have a positive effect on tourism in the area.
- The environmental policies (CP14 and 15; and ES1 – 16) would improve the quality of the natural and built environment. This could benefit tourism and agriculture; as well as helping draw businesses to the District through providing a high quality environment which is attractive to business.

#### Conclusion & recommendations

13.5.14 Despite not knowing the exact quantum of growth, given the Core and Delivery policies it is possible to conclude that significant positive effects in terms of the 'economy and employment' are likely as a result of the Plan. The policies should lead to improvements in retail and leisure provision, development that will benefit the tourist industry, and opportunities for small scale development in the countryside.

13.5.15 The following recommendations are made:

- Introduce flexibility over the floorspace threshold requirements for impact assessments in Policy EI9. To ensure no adverse effects would take place and prevent any 'threshold abuse' of development coming forward just below the threshold leading to negative effects.
- Consider whether there may be benefit to focusing tourism development (Policy EI10) within settlement boundaries to ensure that local people in existing settlements can benefit from tourism development.
- Ensure that tourism development in EI10 specifies no adverse impact on townscape in order to maintain the quality of the built environment for tourists.

## 13.6 Housing

### Relevant sustainability objectives:

- To provide affordable and decent housing to meet local needs.

### Relevant plan policies:

- *Homes and Communities* - **CP7** (Lifetime Communities); **CP8** (New Housing Development); **CP9** (Affordable Housing); **CP10** (Gypsy, Traveller and Travelling Showpeople Sites); **HC1** (Meeting small-scale housing need within defined settlements); **HC2** (Providing new homes above shops in our town centres); **HC3** (Strategic self-build housing provision); **HC4** (Local Housing Need); **HC5** (Replacement dwellings); **HC6** (Residential sub-division of dwellings); **HC7** (Annexes for dependents or carers); **HC8** (Extensions to Dwellings or Live/Work Units)
- *Environment and surroundings* - **CP14** (High Quality Sustainable Development); **CP15** (A Quality Living and Working Countryside); **ES12** (New and better design of places)

### Appraisal

- 13.6.1 Although Development Strategy is yet to be confirmed, it is possible to comment on how negative impacts of any future development on housing in the District will be mitigated and any positive effects of development enhanced as a result of the Core / Delivery Policies
- 13.6.2 **Policy CP7** seeks to ensure that sustainable and inclusive communities continue to be fostered through proposed major developments. The long-term needs of young people, families, the elderly, people with special needs and those people belonging to minority groups with specific identified needs must all be considered when seeking planning permission. The effect should be that a range of housing types, sizes, values and tenures are provided. Similar positive effects on housing should result from **Policy CP8** which requires new developments to take account of housing need as identified in the Strategic Housing Market Assessment; this should ensure that provision is made in proposals for affordable housing. Emphasis is also placed on the requirement to meet housing need through good design which should have positive implications for the quality of new housing in the District. **Policy CP9** supports the grant of planning permission for good mixes/balances of residential development, an element of which will be affordable housing in conjunction with proven affordable housing need. This policy will have positive implications for housing in terms of meeting demand for affordable housing. Positive effects are also likely to result from **Policy CP10** which looks to safeguard existing authorised Gypsy, Traveller and Travelling Showpeople sites, set long-term targets for additional pitches to meet needs and ensure a five year supply of specific deliverable sites throughout the local plans lifetime. This should have positive implications in terms of the supply of affordable and decent housing for Gypsy, Traveller and Travelling Showpeople.
- 13.6.3 **Policy CP14** supports proposals with an emphasis on high quality sustainable development which protects, conserves or enhances the built and natural environment. This policy should have positive implications in relation to housing because the need for development to be of a high quality and sustainable should lead to better housing design and layouts. **Policy CP15** seeks to ensure that countryside quality and individual settlement identities are protected. Planning permission will not be granted for proposals outside identified settlement development limits but for a few exceptions, one of which being 'rural exception sites'. This policy should have positive implications for these locations ensuring that local affordable housing needs can be met.
- 13.6.4 Other policies that could have implications for housing, albeit to a lesser extent, include:
- Policy HC1 seeks to grant permission to residential development or redevelopment within defined settlements providing that a number of criteria are met. One of these is that for larger schemes a variety of dwelling types and sizes to meet identified local needs shall be provided with potentially positive implications in terms of providing the right size and tenure of new homes. Emphasis is also placed on proposed housing being at the appropriate scale

and density, with layout and design also important considerations that will have positive implications for housing quality.

- Policy HC4 will seek to ensure that local affordable housing need is met through housing sites beyond defined settlements if this need cannot be met elsewhere. Furthermore the policy looks to ensure that the gross internal floor areas of affordable dwellings comply with latest HCA standards which will have positive implications for the quality of affordable housing provided.
- Policy HC7 supports the creation of annexes on existing properties where there is a clear requirement for a dependent or full-time carer which should have positive implications for housing in terms of ensuring that provision for appropriate/specialised housing can be made where needed
- Policy ES12 seeks to ensure that the layout and design of new development proposals leads to well designed, socially integrated, high quality, successful places where people enjoy living and working. A contributory element to these aspirations is better designed buildings and the policy emphasises the importance of 'Design Quality' calling for designs that reflect/appreciate context.

#### Conclusion & recommendations

13.6.5

Overall, the preferred approach to Core / Delivery policy should have the effect of mitigating the negative effects and enhancing the positive effects of the Development Strategy. However, the results of this appraisal indicate that the policy approach could be strengthened by:

- Consider requiring a higher percentage of units within qualifying developments to be affordable in order to help address shortfalls in affordable housing delivery.

## 13.7 Landscape and cultural heritage

### Relevant sustainability objectives:

- To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of the built and cultural heritage.
- To conserve and enhance landscapes and townscapes.

### Relevant plan policies:

- *The Development Strategy* - **CP1** (Presumption in favour of sustainable development); **CP3** (Settlement hierarchy); **CP4** (Place making); **CP5** (Environmental development principles for strategic sites);
- *Homes and Communities* - **CP8** (New housing development); **CP10** (Gypsy, traveller and travelling Showpeople Sites); **HC1** (Meeting small-scale housing need within defined settlements); **HC3** (Strategic self-build housing provision); **HC5** (Replacement dwellings); **HC6** (Residential sub-division of dwellings); **HC7** (Annexes for dependents or carers); **HC8** (Extensions to dwellings or live/work units);
- *Economy and Infrastructure* - **CP11** (New employment development); **EI5** (Farm enterprises and diversification); **EI10** (Provision of new tourism opportunities);
- *Our environment and surroundings* - **CP14** (High quality sustainable development); **CP15 A** (Quality living and working countryside); **ES2** (Renewable or low carbon energy generation); **ES7** (Landscape character); **ES10** (Valuing our historic environment and assets); **ES13** (Protection of existing open space)

### Appraisal

- 13.7.1 The Local Plan, albeit yet to be fully presented, is likely to have implications for identified landscape and cultural heritage issues as any level of development has the potential to impact, both positively and adversely on the setting, character and townscape and landscape quality of an area. While the extent to which the Local Plan would impact on particular geographical areas cannot be clearly identified, it is possible to comment on the general likely effects, both positive and negative, of development as a result of the Core and Delivery policies presented.
- 13.7.2 Stroud District sits largely within the Cotswolds Area of Outstanding Natural Beauty (AONB) which includes a number of different landscape character types. The District benefits from a significant number of conservation areas with special architectural or historic interest and has around five thousand Listed Building, including 41 Grade 1 listings. The District also benefits from a number of parks and gardens of Special Historic Interest and from the nearby canal noted for its historical, architectural, nature conservation and educational value. The existing protection already afforded to the natural environment and built and cultural heritage within the District is likely to help preserve the District's identity but there is also likely to be a continuing strain between development pressure and maintaining existing and valued character qualities.
- 13.7.3 The majority of Core and Delivery policies are identified to have a potential impact on the identified Landscape and cultural heritage sustainability objectives. The key policies that have the potential to lead to significant positive or adverse impacts are discussed below.

- 13.7.4 **Policy CP4** – Place Making – should ensure that development proposals accord with the Mini Visions and Guiding Principles for that locality. The policy expects proposals to apply and incorporate locally distinctive architectural styles in accordance with the particular area’s characteristics while conserving or enhancing local biodiversity interest. In doing so it should lead to significant positive impacts in supporting local distinctiveness and build quality while minimising impact on the local environment. Similarly CP8 (new housing development) and **CP11** (New employment development) should also help to conserve the District’s local character through the need for proposals to demonstrate that they won’t “*harm the character, appearance or environment of the site or its surroundings*”.
- 13.7.5 **Policies CP14 and CP15** both seek to ensure that development is appropriate in design and appearance compatible with its surroundings and that it retains important landscape features including natural features for the protection of local environmental quality. In particular CP15 seeks to protect the separate identity of settlements and quality of the countryside; and seeks to ensure that replacement buildings will actually bring about environmental improvements and conversions positively contribute to the established local character and sense of place. The proactive nature of CP15 in requiring positive improvement in character and environmental quality is likely to result in significant positive effects for the sustainability objective to conserve and enhance local landscape quality.
- 13.7.6 Within defined settlement development limits **Policy HC1** requires development be of a suitable scale, layout etc that is compatible with the character and appearance of the settlement; and that it would not cause loss or damage to the landscape setting of the settlement. For replacement of dwellings outside defined development limits **Policy HC5** also requires that replacement dwellings do not detract from the character or appearance of the surroundings and local area. As a result these policies should contribute positively to the sustainability objectives to conserve and enhance landscapes and townscapes.
- 13.7.7 **Policies HC6, HC7, HC8 and EI5** outline the requirements for residential sub-division, annexes and extensions, and farm enterprises and to a greater or lesser degree aim to ensure development is appropriate to local character and setting. In doing so these policies in combination should ensure that incremental development does not result in significant cumulative impacts on landscape or townscape character. In a similar way **Policy EI10** – provision of new tourism opportunities - also requires proposals to “carefully consider the need to protect landscapes and environmentally sensitive sites”, again helping contribute positively to the identified sustainability objectives.
- 13.7.8 **Policy ES7** aims to ensure the conservation and enhancement of the natural and scenic beauty of the landscape within the Cotswolds AONB. It requires development proposals to conserve or enhance the special features of the different landscape characters and that priority will be given to development that demonstrates this. Furthermore, development should ensure that its location, materials choice, scale etc are sympathetic to and complement the landscape character. Specific reference to the key requirements of the sustainability objective to reinforce distinctiveness through the conservation and enhancement of landscapes should ensure a significant positive outcome for this objective within the AONB.
- 13.7.9 **Policy ES10** seeks to ensure the protection of the District’s historic environment. Its requirements for desk based and field evaluation, where necessary, and that proposals which ensure conservation and, in particular, enhance heritage significance will be favoured should help maintain the District’s historic environment into the future. Specifically supporting those developments that contribute to the District’s distinct identity, will in particular help to address the sustainability objective requiring the reinforcement of local distinctiveness.
- 13.7.10 It is also worth noting the following policies are also likely to have implications for landscape and cultural heritage issues, albeit to a lesser extent:
- CP1 Presumption in favour of sustainable development
  - CP3 Settlement hierarchy

- CP5 Environmental development principles for strategic sites
- CP10 Gypsy, traveller and travelling Showpeople Sites
- HC3 Strategic self-build housing provision
- ES13 Protection of existing open space
- ES2 Renewable or low carbon energy generation

#### Conclusions and recommendations

- 13.7.11 Overall, the preferred approach for the Core / Delivery policy is likely to help to ensure that growth can be accommodated whilst securing and reinforcing local distinctiveness and environmental quality associated with local landscapes and townscapes.
- 13.7.12 No recommendations are proposed.

## 13.8 Transport and accessibility

### Relevant sustainability objectives:

- To promote traffic reduction and encourage more sustainable alternative forms of transport.
- To restore, manage and promote the canal towpaths as part of the sustainable transport infrastructure.

### Relevant plan policies:

- *The Development Strategy* - **CP1** (Presumption in favour of sustainable development); **CP3** (Settlement hierarchy); **CP4** (Place making); **CP5** (Environmental development principles for strategic sites); **CP6** (Developer contributions to services, community facilities and infrastructure)
- *Homes and Communities* - **CP8** (New housing development); **CP10** (Gypsy, traveller and travelling Showpeople Sites);
- *Economy and Infrastructure* - **CP11** (New employment development); **CP12** (Town centres and retailing); **CP13** (Demand management and sustainable travel measures); **EI4** (Development on existing employment sites in the countryside); **EI6** (Protecting individual and village shops, public houses and other community uses); **EI10** (Provision of new tourism opportunities); **EI12** (Promoting transport choice and accessibility); **EI13** (Protecting our cycle routes); **EI14** (Provision and protection of rail stations and halts); **EI15** (Protection of freight facilities at Sharpness Docks); **EI16** (Provision of public transport facilities)
- *Our environment and surroundings* - **CP14** (High quality sustainable development); **ES11** (Restoring and regenerating the District's canals); **ES12** (New and better design of places); **ES15** (Provision of outdoor play space)

### Appraisal

- 13.8.1 The Local Plan, albeit yet to be fully presented, is likely to have implications for identified transport and accessibility issues as any level of development has the potential to impact on existing transport infrastructure including as a result of congestion. While the extent to which the Local Plan would impact on particular geographical areas cannot be identified, it is possible to comment on the general likely effects, both positive and negative, of development as a result of the Core and Delivery policies presented.
- 13.8.2 As a rural District with a dispersed population the proportion of trips made by private car is high. Over 30% of all households have two cars or vans. Moreover, car ownership in the District is expected to rise in line with population growth. The District is relatively poorly served by public transport and consequently only 2% of travel to work by either train or bus compared to 4% in the South west and 10% in England and Wales. While the District is well served by canals it is unlikely that even if restored they would displace significant traffic from the existing road or rail network.
- 13.8.3 **Policy CP13** is the key policy regarding transport and accessibility in the District and identifies the key transport related elements that schemes must demonstrate for planning permission to be granted. While the policy does encourage non-car transport modes and improvements for pedestrians and cyclists, its current wording fails to give any greater weight to sustainable travel modes over the private car. In light of the existing over reliance on the private car in the District this policy is unlikely to have any significant positive effect on the baseline.

- 13.8.4 **Policy CP3** which sets out a hierarchy for growth and development across the District's settlements and **Policy CP5** which details the principles for strategic development both aim to support development that would lead to a reduced need to travel by car, either through bringing housing, jobs and services closer together or actively requiring development to be readily accessible by public transport and walking and cycling. The requirement for strategic sites to contribute towards the provision of new sustainable transport infrastructure is likely to lead to significant positive effects on promoting traffic reduction and encouraging sustainable alternative forms of transport to the private car. At the residential and new employment development scale, **Policies CP8 and CP11** reiterate the need to ensure proposals are readily accessible by public transport, bicycle and foot further contributing to positive sustainability outcomes.
- 13.8.5 In terms of **Policy CP12**, regarding town centres and retailing, the need for local centres to be established in areas not within easy walking distance of existing services and support for retail provision with residential areas to serve the local area should also help to promote traffic reduction and enable these services to be more easily accessed by either walking or cycling. In contrast **CP10** - Gypsy, Traveller and Travelling Showpeople Sites – makes no explicit reference to the need for sites to be readily accessible by public transport, walking and cycling and could potentially have significant negative effects on the sustainability objective
- 13.8.6 **Policies EI12 - EI16** are the key travel and transport policies for the District and cover aspects of delivering infrastructure, enhancing accessibility as well as giving protection to cycle routes, rail infrastructure and the freight facilities at Sharpness Docks. The policies' specific reference to the need for an integrated public transport network, including improved walking, cycling and rail facilities, and requirements for development proponents to submit travel plans should help contribute to promoting traffic reduction and encouraging more sustainable travel patterns. However the extent to which these policies reduce reliance on the private car is uncertain as no policies actively discourage car ownership.
- 13.8.7 **Policy ES12 focuses** on reducing traffic conflict and creating high quality successful places in order to reduce travel should help contribute to significant positive impacts on reducing the need to travel. Specific reference to creating segregated pedestrian and cycle infrastructure should also help; however greater opportunities could be realised by placing greater emphasis on car free development and 'shared' spaces on streets to reduce car domination as noted in Policy CP4.
- 13.8.8 **Policy ES11** focuses on restoring and regenerating the District's canals. Although the policy aims to facilitate the improvement or restoration of the canal and towpaths it makes no reference to the opportunity for its use as a sustainable transport alternative. Notably, no other transport related policies identify the canal as a potential sustainable transport choice.
- 13.8.9 It is also worth noting the following policies are also likely to have implications for transport and accessibility issues, albeit to a lesser extent:
- CP1 Presumption in favour of sustainable development
  - CP4 Place making
  - CP6 Developer contributions to services, community facilities and infrastructure
  - CP14 High quality sustainable development
  - DP EI4 Development on existing employment sites in the countryside
  - DP EI6 Protecting individual and village shops, public houses and other community uses
  - DP EI10 Provision of new
  - DP ES15 Provision of outdoor play space

### Conclusions and recommendations

- 13.8.10 Overall, it is unclear whether the preferred approach to Core / Delivery policy is likely to have any significant impact in terms of promoting traffic reduction and discouraging car ownership/use. Currently, the policies give broadly equal weight to road infrastructure provision compared to other more sustainable transport alternatives.
- 13.8.11 The following recommendations are made:
- CP10 should include explicit locational criteria (as per CP8 and CP11) requiring that sites be readily accessible by public transport, bicycle and walking in order to reduce reliance on and number of vehicle movements.
  - ES11 could identify and support measures to improve access to the canal for its use for transportation

## 13.9 Waste

### Relevant sustainability objectives:

- To minimise the amount of waste produced, maximise the amount of material that is reused or recycled, and seek to recover energy from the largest proportion of the residual material

### Relevant plan policies:

- *Economy and infrastructure* – **CP11** (New employment development);
- *Environment and surroundings* – **ES1** (Contributing to a low carbon future)

### Appraisal

13.9.1 The policy approach outlined in **Policy ES1** sets out to encourage new developments to use sustainable construction techniques that promote the reuse and recycling of building materials, maximise opportunities for the recycling and composting of waste on all new development proposals. This is supported by targets for the achievement of the Code for Sustainable Homes, which takes into account the sourcing and environmental impact of the materials used to build homes. As such, it is considered likely that this approach will lead to positive effects against the baseline.

13.9.2 Whilst at present **Policy CP11** does not refer to resource efficiency, it does have the potential for industrial symbiosis<sup>47</sup> to be included as a consideration. For instance, proposals could be called upon to demonstrate that they have considered how their waste could be used as a resource by other local businesses and industries; plus how they could potentially derive resources from other local businesses and industries in the locality.

### Conclusion & recommendations

13.9.3 In conclusion, the preferred approach of the Core / Delivery policies in terms of waste should have the effect of bringing about increased levels of material efficiency in construction regardless of the level and location of growth pursued in the Development Strategy. The positive effects of the strategy could however be augmented with a greater focus on encouraging industrial efficiency in business and industry.

13.9.4 The following recommendation is made:

- Include considerations of industrial symbiosis when deciding upon development applications for new business and industrial premises through Policy CP11

---

<sup>47</sup> Industrial symbiosis can be defined as the sharing of services, utility, and by-product resources among diverse actors in order to add value, reduce costs and improve the environment.

## 13.10 Water

### Relevant sustainability objectives:

- To maintain and enhance the quality and quantity of ground and surface waters.
- To manage and reduce the risk of flooding in new and existing development.

### Relevant plan policies:

- The Development Strategy - **CP1** (Presumption in favour of sustainable development); **CP5** (Environmental development principles for strategic sites);
- Economy and Infrastructure - **CP11** (New employment development);
- Our environment and surroundings - **CP14** (High quality sustainable development); **ES1** (Contributing to a low carbon future); **ES3** (Maintaining quality of life within our environmental limits); **ES4** (Water resources and flood risk)

### Appraisal

- 13.10.1 The Development Strategy (as yet undecided) is likely to have implications for identified water sustainability issues; as any level of development has the potential to impact on existing water resources, water management practices and flood risk. The Core and Delivery policies that are a focus of the current consultation will play an important role in terms of ensuring that negative effects are avoided / mitigated, and also ensuring that new development brings with it benefits.
- 13.10.2 There are 16 river water bodies in Stroud District with varying levels of water quality, the majority (88%) classed as “moderate” with approximately 6% being “poor” and 6% being “good”. Much of Stroud District is classified as a Nitrate Vulnerable Zone meaning that local farmers have to follow mandatory rules to tackle nitrate loss from agriculture. What this means for the Plan is that it should ensure development does not exacerbate this problem. Another key issue relates to flood risk. There are existing problems, and it is likely that flood risk will increase in the District in the future. Increased droughts and water scarcity are also likely and the likelihood of this will need to be reflected within development proposals.
- 13.10.3 The consultation document presents a number of policies that should help address identified sustainability issues. **Policy CP5** identifies the need for strategic sites to have “low impact” in terms of the environment and use of resources and that proposals show how they meet the objectives of minimising water consumption and incorporating Sustainable Drainage Systems (SuDS). **Policies CP11 and CP14** also reinforce the need for SuDS and establish support for development that does not result in increased risk of flooding or unacceptable water pollution.
- 13.10.4 Delivery **Policies ES3 and ES4** focus on ensuring development doesn’t result in unacceptable levels of pollution to water or flood risk on or off site, but stops short of reiterating the requirement of CP14 for *no* increased risk of flooding as a result of development. Policy ES4 specifically requires SFRA’s to inform the location of future development which should mitigate risk of locating development in flood risk areas. Also, the requirement that consideration be given to the long term adoption and maintenance of SuDS should ensure those measures most appropriate to the specific requirements of the location. Explicit mention of measures to enhance ecological flood storage may result in improved flood management and lead to positive outcomes in terms of a range of sustainability objectives.
- 13.10.5 Another policy that could have implications for water, albeit to a lesser extent is ES1 (Contributing to a low carbon future).

### Conclusions & recommendations

- 13.10.6 Overall, the preferred approach to Core / Delivery policies should have the effect of mitigating the negative effects associated with the Development Strategy.

13.10.7 The following recommendations are made:

- Provide further detail, and highlighting examples of the opportunities of natural flood risk prevention measures as part of SuDS in order to strengthen the application of ES4 (Water resources and flood risk).
- Policy ES3 should be strengthened to ensure permission will not be granted to any development that would lead to increased flood risk on or off site, not simply an “unacceptable” level of risk.

**PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?**

**15 INTRODUCTION (TO PART 4)**

15.1.1 This Part of the report explains next steps that will be taken as part of plan-making / SA.

**16 PLAN FINALISATION**

16.1.1 Subsequent to the current consultation, the Council will prepare the Proposed Submission Plan. This will be Published (in-line with Regulation 19 of the Local Planning Regulations, 2012) so that representations can be made prior to the Plan being 'Submitted' (to Government, who will then appoint an Independent Planning Inspector to 'Examine' the Plan and pass judgement on its 'Soundness').

**17 ADOPTION AND MONITORING**

17.1.1 Once judged to be 'Sound', it will be possible for the Council to formally adopt the Plan. At the time of adoption an 'SA Statement' must be published that sets out (amongst other things):

- How SA Report Published alongside the Proposed Submission Plan and representations made have been taken into account when finalising the plan; and
- Measures *decided* concerning monitoring.