



STROUD DISTRICT COUNCIL

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Ms Lucas and Ms Wright
The Planning Inspectorate
Temple Quay House
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BS1 6PN

7 November 2025

Dear Ms Lucas and Ms Wright

Re: Stroud District Local Plan Review Examination – Your Letter of 09 October 2025

Thank you for your letter of 9 October 2025, setting out your position regarding the Stroud District Local Plan Review Examination.

We have carefully considered the points raised. While we acknowledge the complexities involved, we must formally record our strong disagreement with the conclusion that plan withdrawal is the most appropriate way forward. We believe this conclusion is based on a flawed understanding of national policy, guidance and misunderstandings of fact, leading to flawed conclusions, which underestimate the plan's robustness and the Council's capacity to resolve the remaining matters efficiently.

1. Assessment of Transport Evidence

We note your conclusions regarding the need for extensive additional transport modelling, with which we disagree. We are concerned that these conclusions appear to be based on an incorrect technical interpretation of the highway evidence, an area which is the statutory responsibility of the local highway authority (Gloucestershire County Council) and the expert domain of National Highways. The Council's view is that the need for any additional transport modelling, aside from the scale of further work is questionable. In our view, the evidence base as it stands provides a sufficient foundation for the Examination to proceed to a hearing session where these specific technical matters can be properly tested and understood by the relevant parties.

2. Housing Delivery and Trajectory

Your letter suggests that potential deletion of certain site allocations would create a soundness issue regarding housing need. We are disappointed at this inference, as the highways evidence now accepted by National Highways clearly demonstrates the draft Plan's ability to meet the district's identified housing needs in a deliverable manner. The only question on the deliverability of the housing trajectory has been the need for and timing of motorway junction improvements, and the level of housing which could be delivered in advance of the junction improvement schemes. This is a matter in respect of which National



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Highways is the statutory consultee. The evidence on this front has been accepted by National Highways. Their acceptance is set out in the modelling reports. If the Inspectors have concerns over whether this represents National Highways' formal position, this could be easily addressed through correspondence or clarified at a hearing session.

3. Proposed Timetable and Delay

Your view that a further 12-month pause is necessary, leading to an adoption date no earlier than 2027, appears to assume that additional detailed strategic modelling scenarios are needed. This is refuted by the Council and has not been requested by any of the Highways Authorities. The issues cited, including the local highway mitigation measures, are already identified and programmed within already submitted Infrastructure Delivery Plan (IDP). We are concerned that you are conflating matters to be addressed through the planning application process with those which are required to determine the soundness of the draft Plan. For example, it is unclear why you raise matters of the ongoing assessment of the Sharpness planning application by National Highways, despite the fact that National Highways itself has already set out its position on the impacts at J14 without needing that additional assessment itself.

We are confident that, with a focused hearing timetable, the remaining matters could be resolved within a much shorter, more reasonable timeframe without the need for such a protracted delay.

4. Mitigation for Local Highway Impacts

We note your concerns regarding impacts on the local highway network. We believe that you have misinterpreted the clarifications provided within the National Highways modelling reports on the scope of those studies. It is right and proper that National Highways highlights that it has not considered the road network for which it is not responsible. However, these issues are not new; they have been anticipated and are addressed by committed mitigation measures within the IDP, which falls under the jurisdiction of Gloucestershire County Council and South Gloucestershire Council, for example, the fact that the B4059 junction adjacent to J14 will experience capacity issues without mitigation. The mitigation in response is identified as a scheme within the IDP and has already been established through the evidence base.

What is also already clear is that the market is driving forward this draft plan with the Highways Authorities, in stark contrast to your conclusions. Strategic allocations such as Cam and Sharpness are using the approach we have agreed with highways partners and are assessing the local road network impacts as envisioned and set out in the IDP through the planning application process. This is not a matter to delay the local plan or for Examination scrutiny.

5. The Ministerial Direction on Flexibility and Statutory Requirements

We note your position that "*we still consider that withdrawal of the Stroud District Local Plan Review from Examination is the most appropriate way forward.*" This position appears



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inconsistent with the clear direction from the Minister of State for Housing and Planning, Matthew Pennycook, in his letter of 9 October 2025. The Minister emphasises that it is *"critical that Inspectors approach examinations of current system plans with the appropriate degree of flexibility"* and states unequivocally that *"where plans are capable of being made adoptable, I want Inspectors to seek to do so in the examination process."*

Specifically, the Minister welcomes that *"in some cases Inspectors are already exercising a degree of flexibility to expedite adoption of local plans,"* citing *"pragmatic decisions to proceed toward adoption in instances where a five-year housing land supply cannot be evidenced at the point of adoption but where the plan significantly boosts supply and still meets housing needs over the plan period."*

This draft Plan is precisely such a case. It seeks to significantly boost housing supply, meet identified need in full, and is capable of being made adoptable. As we have maintained, we believe that your residual concerns could and should be addressed through an Examination hearing session.

Conclusion

We remain firmly of the view that all outstanding matters are either resolved or capable of resolution, primarily through addressing the misunderstandings that appear to underpin your current position in relation to policy, guidance, and factual interpretation. These are matters that would benefit from the clarity and scrutiny afforded by a further hearing session.

In our opinion, discontinuing the draft Plan prior to holding such a hearing would be a disproportionate and unnecessary step. We consider that the appropriate and proper course of action is to continue the Examination through the established hearing process, enabling the updated evidence to be fully considered.

We therefore respectfully urge you to reconsider your position.

Should you decide not to revise your position, we can confirm that Stroud District Council will not be withdrawing from the Examination. In that event, we request that you proceed to issue a full report in accordance with the Planning Inspectorate's Examination Procedural Guide, including clear and reasoned justification for any recommendation of non-adoption.

Section 20(7A) of the Planning and Compulsory Purchase Act 2004 imposes a statutory duty to provide reasons for any recommendation of non-adoption. The Procedure Guide for Local Plan Examinations also sets the expectation that Inspectors will provide reasoned judgements for their conclusions and recommendations.

We ask that you revisit the policy, guidance, and factual misunderstandings outlined in your latest letter. If these are repeated in your final report, there is a risk that the report could be open to legal challenge. In our view, convening a hearing to address these matters would help to avoid or mitigate that risk prior to the publication of your report.

In light of clear ministerial direction, we also request that your final report explicitly sets out why adoption of the draft Local Plan, alongside a commitment to an early review, does not



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represent the flexible and pragmatic approach advocated by the Minister. Furthermore, we ask that you explain how non-adoption better serves the Government's objective of significantly boosting housing supply, compared to adoption with early review. This approach, which we have consistently advocated, would also provide a platform for securing funding to address local infrastructure needs. Withdrawing the plan and starting a new plan would not be a quicker process or help the Council or the Governments objectives, as a new plan will take at 30 months under the new system. This would result in Stroud having no adopted up to date local plan until 2029 at the earliest. To date, the Council has not received any reasoning that addresses this critical issue.

We therefore request a report that fully and properly addresses these key matters and makes recommendations on all aspects of the draft Plan that have been considered through hearings and written representations, clearly setting out what you find sound and unsound. This is imperative to allow the Council to move forward and consider a new local plan and the issues involved.

Given the Government's stated intention to accelerate housing delivery through the planning system, we would be grateful if you could confirm either your reconsideration of the position or the expected timescales for issuing your report. This would support a more open and transparent process for all parties involved.

Yours sincerely

Kathy O'Leary
Chief Executive