

27 November 2014

To all Members of Stroud District Council

You are hereby summoned to attend an Extraordinary Meeting of the **STROUD DISTRICT COUNCIL** at **7.00 pm** in the Council Chamber, Ebley Mill on **Tuesday, 9 December 2014.**



David Hagg  
Chief Executive

## **AGENDA**



**Please Note:** This meeting will be filmed for live or subsequent broadcast via the Council's internet site ([www.stroud.gov.uk](http://www.stroud.gov.uk)) and by entering the Council Chamber you are consenting to being filmed. The whole of the meeting will be filmed except where there are confidential or exempt items, which may need to be considered in the absence of the press and public.

- 1 **APOLOGIES**  
To receive apologies for absence.
- 2 **DECLARATIONS OF INTEREST**  
To receive declarations of interest.
- 3 **STROUD DISTRICT LOCAL PLAN**  
To consider the results of additional work carried out since the suspension of the Local Plan Examination to meet option (a) of the Inspector's Initial Conclusions on Stage 1 of the Examination.
- 4 **STROUD VALLEYS INITIATIVE**  
To approve the concept for a strategic approach to tackling flood management and regeneration issues within the Stroud Valleys.

**STROUD DISTRICT COUNCIL**

**AGENDA  
ITEM NO**

**EXTRAORDINARY MEETING OF COUNCIL**

**9 DECEMBER 2014**

**3**

<b>Report Title</b>	<b>STROUD DISTRICT LOCAL PLAN</b>
<b>Purpose of Report</b>	To consider the results of additional work carried out since the suspension of the Local Plan Examination to meet option (a) of the Inspector's Initial Conclusions on Stage 1 of the Examination
<b>Decision(s)</b>	Following consideration by the cross-party Planning Review Panel and based on its recommendations, Council RESOLVES; <ol style="list-style-type: none"><li>1. To proceed with the Stroud District Local Plan;</li><li>2. To adopt Option 2 which provides for a new dwelling requirement of 11,200 by 2031;</li><li>3. To adopt Option D Alternative M5 Catchment Stonehouse Focus;</li><li>4. To reaffirm that the Local Plan will be subject of review within five years of adoption;</li><li>5. To approve the list of proposed changes to the submitted Stroud District Local Plan set out in Appendix 3 and recommend these to the Inspector as future main modifications to the Local Plan;</li><li>6. To request that the Inspector reconvenes the examination into the Local Plan.</li></ol>
<b>Consultation and Feedback</b>	<p>The draft Stroud District Local Plan has been in preparation since 2009. There have been numerous consultations with stakeholders and communities.</p> <p>The Council's Planning Review Panel has met regularly since July 2014 to consider the emerging evidence and potential changes to the Local Plan. The Planning Review Panel is cross-party, does not have any decision-making powers and reports to Strategy and Resources Committee. With the previous agreement of group leaders, it has always been recognised that the timetable would require the panel to make recommendations direct to full Council.</p> <p>At its meeting on 19<sup>th</sup> November, the Planning Review Panel considered a draft report and framed the recommendations for the Council report. All panel members present agreed that these should</p>

	<p>be the recommendations - Cllr Lydon (Chair L), Cllr H Jones (C), Cllr Whiteside (G), Cllr Smith (LD), Cllr Studdert-Kennedy (CNG), Cllr Hurst (C) and Cllr Pickering (G)</p> <p>There will be a formal period of public consultation in spring 2015 on any recommended modifications to the submitted Local Plan.</p>
<p><b>Financial Implications and Risk Assessment</b></p>	<p>There are no financial implications arising directly from this report. However, there remains a financial risk to the Council in not being able to progress to stage 2 of the examination due to the uncertainty, potentially leading to speculative planning applications and potential costs of planning appeals if permission is refused.</p> <p>There will be additional costs arising from finalising the Local Plan, which will need to be considered by members as part of the Council's budget and Medium Term Financial Plan in January 2015.</p> <p>David Stanley – Accountancy Manager Tel: 01453 754100 Email: <a href="mailto:david.stanley@stroud.gov.uk">david.stanley@stroud.gov.uk</a></p> <p>Delay or failure to approve the document is likely to impact negatively on the ability of the local planning authority to demonstrate an ongoing 5 year housing land supply when considering future planning applications. An up-to-date Local Plan provides the means to achieve this and to reduce the risk of unplanned development on greenfield sites.</p>
<p><b>Legal Implications</b></p>	<p>It is imperative that the draft local plan meets the legal requirements in terms of 'soundness'. The additional work undertaken and recommendations to which this report refers are made in order to overcome the specific concerns raised by the Inspector regarding the soundness of the Council's previous assessment of housing and employment requirements in the district, without such amounting to a substantial revision of the plan which would necessitate public consultation, additional costs and delay in the eventual adoption of the plan. Should the draft plan not be considered 'sound' by the Inspector in respect to these key elements, there would not be any prospect of the plan being adopted. This would materially prejudice the Council's current and future ability to secure what it reasonably considers to be appropriate development across the district; indeed, the extent of development in the district would largely if not</p>

	<p>solely be dictated by central, rather than local government policy.</p> <p>Karen Trickey, Legal Services Manager &amp; Monitoring Officer  Tel: 01453 754369  Email: <a href="mailto:karen.trickey@stroud.gov.uk">karen.trickey@stroud.gov.uk</a></p>
<b>Report Author</b>	<p>Mark Russell/Planning Strategy Manager  Tel: 01453 754305  Email: <a href="mailto:mark.russell@stroud.gov.uk">mark.russell@stroud.gov.uk</a></p>
<b>Options</b>	<p>There are a number of alternative options regarding revised housing figures, with associated risks:</p> <p>(1) Accept the demographic OAHN figure of 10,400 dwellings (2006-31) (416 p.a.) but make no additional allowance for supporting higher job forecasts. There is a risk that the Inspector will not accept this approach given his previous concerns that housing provision should not constrain economic growth and that the Council has taken the lowest figure within a potential range and continued past trends. If the Council has not identified sufficient housing to meet a higher figure, the Inspector may recommend that the Plan is withdrawn.</p> <p>(2) Accept the demographic OAHN figure and a 800 dwellings uplift for economic factors – total 11,200 dwellings (448 p.a.). This reflects the consultant recommendations for a reasonable allowance to be made to support economic growth and analysis across the wider housing market area. This is considered to be a prudent approach with the lowest risk that the Inspector may take an alternative approach.</p> <p>(3) Propose a demographic OAHN figure of above 10,400 dwellings and provide for the full Cambridge Econometrics 1800 dwellings uplift and additional dwellings for other market, social and economic factors – total 12,200+ dwellings (488+ p.a.). This reflects a view within the development industry that there should be a full return to past demographic trends and further allowances should be made for higher economic forecasts, affordable housing needs and historic under delivery. This option has the advantage that it would significantly boost housing supply and reflects an optimistic view of future economic performance. However, it is likely to over-estimate needs and may be undeliverable.</p>

	<p>(4) Withdraw the Local Plan pending a future further review of housing needs and/or alternative distribution strategy. This responds to the Inspector's Option (c) in his Initial Conclusions report. This would result in at least a two year delay to the adoption of the Local Plan. In the interim, planning applications would be granted permission unless any adverse impacts significantly and demonstrably outweigh the benefits when assessed against national policy. Adopted and draft Local Plan policies would have very limited weight.</p> <p>A range of alternative growth scenarios to meet the revised housing requirements have also been considered and assessed (see Appendix 1):</p> <p>Option A: Extend existing sites  Option B: Stroud Focus  Option C: M5 Catchment Eastington Focus  Option D: Alternative M5 Catchment Stonehouse Focus  Option E: Extend Existing Sites + Stonehouse  Option F: Extended Growth at Preferred Strategy Areas  Option G: + Extended Growth at M5 Catchment</p> <p>Option D is considered to be the best performing option that meets the recommended revised housing target. Option A performs less well but is a potential option should a lower revised housing figure be chosen. Options E, F or G would need to be chosen if a housing figure of above 11,700 is chosen.</p>
<p><b>Performance Management Follow Up</b></p>	<ul style="list-style-type: none"> <li>• December 2014: The Council will ask the Inspector to reconvene the Local Plan Examination.</li> <li>• January 2015: Stage 1 of the examination reconvenes with a further hearing sessions to consider the housing and employment numbers</li> <li>• March 2015: Stage 2 of the examination starts with further hearing sessions looking at the distribution strategy, site allocations and other policies of the plan</li> <li>• Spring/Summer 2015: Consultation on modifications to the plan recommended by the Inspector</li> <li>• Autumn 2015:</li> </ul>

	<p>The Inspector makes his recommendations</p> <ul style="list-style-type: none"> <li>Autumn / Winter 2015</li> </ul> <p>The final Plan is considered and adopted by the Council.</p>
<b>Background Papers/ Appendices</b>	<p>The following papers can be accessed <a href="#">here</a>:</p> <ol style="list-style-type: none"> <li>Assessing the housing requirements of Stroud, Forest of Dean and Cotswold</li> <li>Gloucestershire strategic housing market assessment update</li> <li>5 year land supply update</li> <li>Stroud employment assessment</li> <li>Employment land availability</li> <li>Growth scenarios paper</li> <li>Interim sustainability appraisal report</li> <li>HRA analysis of housing options</li> <li>Habitat regulation assessment 2014</li> <li>Role and function of settlements study</li> <li>Transport assessment</li> <li>Infrastructure delivery plan refresh</li> <li>SFRA 2 addendum report</li> <li>Flood risk sequential test update Nov 2014</li> </ol>

## Background

1. The current Stroud District Local Plan was adopted in November 2005. The Council has been preparing a replacement Local Plan since 2009. The Council submitted a draft District Local Plan to the Planning Inspectorate in December 2013. Mr. Stephen Pratt, an Inspector appointed to conduct the examination into the Local Plan held hearing sessions during April 2014 looking primarily at Duty to Co-operate, Housing and Employment requirements issues.
2. Although Mr. Pratt decided that the Council had passed the Duty to Cooperate, he concluded in his Initial Conclusions on Stage 1 of the Examination report in June 2014 that *“significant further work is necessary to ensure that a soundly based objective assessment of housing and employment requirements has been undertaken, having regard to the assessments already undertaken for the JCS area of the wider strategic housing market area and the relationship with the economic strategy for Stroud and the wider area. Further work is also needed to complete all the outstanding technical evidence to ensure that the strategy, including specific site allocations, is fully justified and soundly based, particularly relating to flood risk, waste water, highways and traffic; this will also involve amendments to the Strategic Infrastructure Delivery Plan. Finally, the detailed amendments to the wording of some of the policies and associated text sought by other prescribed bodies (such as English Heritage, Natural England, Environment Agency and Highways Agency) need to be agreed and finalised.”* (para. 52).

3. The Council decided in July 2014 to ask the Inspector to suspend the examination for 6 months in order for the Council to undertake this further work. A number of studies have been undertaken since July 2014 to address matters arising from the Inspector's initial conclusions. These are identified as background papers to this report. Appendix 2 identifies how these studies have addressed the Inspector's recommendations. The main outputs from these studies are summarised below.

### **Housing assessment**

4. An assessment of housing needs has been carried out for the Council by Neil McDonald.
5. The report identifies a demographic requirement for 10,400 net additional dwellings to meet forecast population and household increases. In addition, a further 800 dwellings are required to support anticipated job growth arising from the latest economic forecasts. In total an objectively assessed need for 11,200 new dwellings is recommended for the Local Plan period.
6. The assessment also looked at housing requirements for the period 2011-2031, which reflects the time periods being used by the JCS and Cotswold authorities in their local plans. The demographic requirement for this period is 8,700 net additional dwellings and, taking account of other factors, the total objectively assessed need for 9,500 new dwellings is recommended for the period 2011 to 2031.
7. The assessment includes a range of assumptions, most notably that an allowance should be made for a partial return to long term household formation rates for 25 to 34 year olds as the economy moves out of recession, and that extra homes may be needed to support economic growth although not at a level suggested by the highest economic forecasts. Neil McDonald has carried out a number of sensitivity tests to check the robustness of these assumptions. He has also confirmed that his approach is consistent and compatible with the approach taken for the JCS and for the rest of the Gloucestershire Strategic Housing Market Area.
8. Whilst Council can interrogate and challenge these assumptions, there is a risk associated with taking an alternative approach to the recommended figures (see options above). In particular, the Inspector in his Initial Conclusions cautioned against "*projecting forward recessionary trends*" (para. 30.) and "*unduly pessimistic assumptions about potential economic and employment growth*" (para. 34). Council needs to return to the Inspector with a revised robust evidence base that does not invite repeat conclusions.

## Housing supply

9. A further assessment of housing supply has been undertaken. In April 2014 a full re-survey of land availability was carried out and in October 2014 a recalculation of the Council's Five Year Land Supply has been undertaken. Following a recommendation from the Planning Review Panel, officers have updated the land supply position to 1 October 2014, taking into account all permissions granted since April 2014.

**Table 1: Summary of housing requirement and supply**

		<b>2006-31</b>
<b>A</b>	<b>Housing requirement</b>	<b>11,200</b>
B	Completions (1 April 2014)	3,260
C	Commitments (at 1 April 2014)	4,040
D	Additional permissions (1 April - 31 October 2014)	430
E	Undeliverable permissions (at 31 October 2014)	412
<b>F</b>	<b>Housing supply (1 October 2014) (B+C+D-E)</b>	<b>7318</b>
G	Residual requirement (A-F)	3882
H	Draft Local Plan allocations and windfall	2450
I	Shortfall (G-H)	-1432

10. The figures demonstrate that in order to identify sufficient housing to meet the Local Plan requirements for the whole plan period, a further allocation of at least 1432 net additional dwellings is required. If the Inspector recommends a revised Plan period of 2011-31, there is a larger shortfall of 1705 net additional dwellings due to the number of completions in the period 2011-2013 being below the annual requirement.
11. Monitoring of the current housing supply demonstrates that at 1 November 2014, using a target figure of 11,200, the Council can currently demonstrate a 7.1 years supply of housing, without any additional housing allocations. However, to maintain a 5 year supply into the future, will require the Council to make additional housing allocations, as once current permissions are developed out, the Council will be relying increasingly on housing allocations to deliver the future land supply. The issue of current development management decisions is discussed later in this report.

## Housing growth scenarios

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



13. This leaves the Council with relatively little room for manoeuvre. To avoid the risk that any changes to the Plan result in a fundamentally different plan, any consideration of reasonable site alternatives at this stage in the process should be based on sites which were considered positively in the context of the preferred strategy established during 2011/2012, which were based on the results of technical appraisal and were subject to public consultation. Introducing a new site at this stage which has not been through assessment in the context of the preferred strategy and has not been subject to public consultation through the plan process, would risk the Inspector concluding that the plan is fundamentally different.
14. Seven alternative growth scenarios were identified to undertake further testing to identify the best performing scenario (Appendix 1). Potential site options were grouped according to their relationship to the preferred locations identified in the Preferred Strategy (February 2012) document. The seven scenarios were:
  - Option A: Extend existing sites
  - Option B: Stroud Focus
  - Option C: M5 Catchment Eastington Focus
  - Option D: Alternative M5 Catchment Stonehouse Focus
  - Option E: Extend Existing Sites + Stonehouse
  - Option F: Extended Growth at Preferred Strategy Areas
  - Option G: + Extended Growth at M5 Catchment
15. The scenarios have been tested by the Council's sustainability appraisal consultants URS against sustainability appraisal criteria. The scenarios were also assessed against Habitat Regulation Assessment (HRA) criteria.
16. The scenarios have also been tested to establish those that are most in accordance with the Local Plan's development strategy. Criteria included the extent to which each scenario concentrated growth at the first tier settlements; the size of urban extensions and their ability to deliver jobs and provide access to public transport services.
17. The individual site options were also reassessed, including updated accessibility data obtained from the County Council.
18. The overall conclusions are that:
  - Growth scenarios A, B and C do not deliver sufficient housing to meet the new housing assessment requirement figure of 11,200 net additional dwellings;
  - Growth scenario D has the largest number of highest ranking scores compared against sustainability appraisal objectives.
  - Growth scenarios C and D do not have any significant adverse effects when compared against sustainability appraisal objectives.
  - Growth scenarios were ranked A,D,B,C,E,F and G, from most favourable to least favourable in terms of HRA criteria

- Growth scenarios D, E, F and G perform better than scenarios A, B or C at delivering growth in accordance with the Local Plan's development strategy;
19. The evidence suggests that Growth Option D performs better than other growth scenarios at delivering the required level of housing growth in the most sustainable way and in a way that accords with the Local Plan development strategy.
20. A final wider assessment has looked at planned housing distribution across the District and at the extent to which this reflects and promotes the relative role and function of existing settlements within the District. This analysis has identified that whilst 63% of the housing supply in the submitted Local Plan is identified at the first tier settlements of Cam, Dursley, Stonehouse and Stroud and south of Gloucester, only 3% is identified for Stonehouse, compared with 9% at Cam, 9% at Dursley and 16% at Stroud.
21. Stonehouse is one of the most sustainable settlements in the District, for example it has the best employment density (ratio of local jobs to working residents) in the District and more people resident in the town work within the town compared with any other settlement. Stonehouse contains the third largest economically active population, and a good range of strategic and local facilities and services. The town also benefits from good transport links within the M5 corridor and a mainline station. On this basis, there is a case for additional housing required to meet any shortfall to include an additional allocation at Stonehouse to provide a better balance between planned housing supply and the role of settlements within the District.

### **Recommended changes to the housing distribution**

22. The following table summarises the main proposed changes to the Local Plan housing requirement and supply figures:

**Table 2: Changes to Housing Numbers**

	<b>Submitted Plan</b>	<b>Proposed Changes</b>
Housing Requirement	9,500	<b>11,200</b>
Housing Commitments	7,091	7,318
Housing Allocations		
Hunts Grove Extension	500	500
North East Cam	450	450
Sharpness	300	300
Stroud Valleys	300	<b>450</b>
West of Stonehouse	-	<b>1350</b>
Council Housing Programme	150	150
Dispersal / windfall	750	750
<b>Total Supply</b>	<b>9,541</b>	<b>11,268</b>

23. A comprehensive review of opportunities within the Stroud Valleys has been undertaken to maximise the amount of housing that could be realistically achieved from brownfield land, whilst reflecting site constraints and issues of deliverability. Analysis has identified the opportunity to increase the housing allocation within the Stroud Valleys from 300 dwellings to 450 dwellings through the following changes:
- increase the housing capacity at Ham Mills and Wimberley Mills, to reflect recent active promotion of these sites by site owners through the planning process;
  - increase the housing capacity at Brimscombe Port, to reflect the latest market testing and revised viability testing
24. However, increasing the housing requirement from 9,500 to 11,200 dwellings cannot be achieved solely through additional brownfield land development. Growth of this nature will inevitably involve additional greenfield development.
25. Growth Scenario D involved exploring opportunities to extend housing allocations at Hunts Grove to increase capacity from 500 to 750 dwellings and at North East Cam to increase capacity from 450 to 750 dwellings. Whilst land is available in these locations to achieve increased housing capacities, these extensions are not required to deliver 11,200 dwellings under this Growth Scenario. Should additional housing numbers be required over and above 11,200 dwellings, these remain options for further consideration.
26. Growth Scenario D involves retaining the existing housing allocation at Sharpness. This is fully supported by the Canals and River Trust which is currently preparing detailed proposals to deliver the Local Plan allocation.
27. Growth Scenario D involves the allocation of an additional mixed use allocation at West of Stonehouse. This site was recommended by the Council as a strategic mixed use allocation in the Preferred Strategy consultation document (Spring 2012) and was recommended as a reserve site by officers in July 2013. Although the site was taken out of the submitted plan, the site was assessed as part of the published Sustainability Appraisal (December 2013) and Infrastructure Delivery Plan (July 2013) which underpin the current draft Local Plan.
28. The site is fully in accordance with the development strategy as it involves a planned mixed use urban extension to one of the District's main settlements; it will deliver employment and housing (including over 400 affordable houses) together; and will bring forward significant infrastructure to support the development including a local centre, primary school, open space and community facilities. Whilst it is recognised that the current transport links between the site and the town centre are not ideal, there are opportunities through the allocation to improve these links. The site performs better than other strategic options and performed well in the Carbon Footprint Study (September 2011), in the Preferred Strategy

Sustainability Appraisal (2012) and in the Sustainability Appraisal of alternative options published with the submitted plan (December 2013).

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

**Percentage of total planned housing supply 2006-2031**

<b>Location</b>	<b>Submitted Plan</b>	<b>Potential Changes</b>
Cam	9%	8%
Dursley	9%	7%
Stonehouse	3%	15%
Stroud town	16%	14%
South of Gloucester	26%	22%
Rest of District	37%	34%

30. A draft policy for a mixed use development West of Stonehouse has been prepared, taking into account policy and infrastructure requirements identified in the supporting technical studies. To ensure a high quality designed development, the draft policy stipulates that the design vision and form and design of the main perimeter elevations will be submitted to and agreed by the Council before reserved matters applications can be considered. This will ensure that design quality is maintained throughout the build out of the development. Developers will be required to ensure that the 10 ha of employment land is provided in parallel with housing delivery. Over 400 affordable homes will be provided to meet local needs. The development will provide for improvements to transport links with Stonehouse town centre and contributions to a new Stonehouse railway station. A range of community benefits will be provided in parallel with housing delivery including new primary school, local centre including shopping and community building / sports pavilion, contribution to local community services and extensive publicly accessible natural greenspace and landscaped buffer areas to protect the separate identify of Nupend and Nastend.

**Employment assessment**

31. An assessment of employment land needs has been carried out for the Council by BE Group, who produced the Employment Land Study for the Council in 2013. A summary of their findings is that:
- The Employment Land Study (2013) is in accordance with NPPF and guidance
  - The JCS and SDC approach to future land needs is largely consistent
  - The Local Plan supports the LEP and SEP through M5 corridor allocations

- A review of the latest OE and CE economic forecasts indicates that, on balance, OE better reflects growth identified in the ELS research
  - SDC do not rely on economic forecasting alone but analyse three alternative methods for forecasting land requirements: Historic take up rates; latest employment based forecasts and labour supply forecasts
  - Using employment forecasts, there will be a surplus of employment land by 2031 of between 13.84 and 39.36 ha. Using historic take up rates, the Plan provides sufficient employment land. A worst case scenario is a shortfall of 6 ha by 2031 or 17.6 ha if a buffer is applied.
  - Using a historic land take up method, an employment land need of 58 ha is identified for the Local Plan period.
  - On the basis of the review there is no need for further allocations now, but a need to review within 5 years
32. It is proposed that a new draft policy is included within the Local Plan supporting the Berkeley Centre as a B1-B8 employment and educational resource, supporting the SEP GREEN Skills Project.

### **Further transport assessment work**

33. Consultant Atkins has undertaken a detailed transport evaluation of Growth Scenario D and has identified suitable mitigation measures using a methodology agreed jointly between the Council, the County Council and the Highways Agency. Up-to-date traffic surveys at major road junctions undertaken during September and October 2014 informed the assessment.

### **Infrastructure Delivery Plan**

34. Consultant Arup undertook a review of the infrastructure requirements arising from Growth Scenario D. A briefing pack was sent to service providers and their responses have informed the review.

### **Meetings with Statutory Bodies**

35. Discussions have been ongoing since July 2014 with statutory bodies, including the Environment Agency, the Highways Agency, Natural England and English Heritage to overcome outstanding objections to the content of the Local Plan and to discuss potential changes. Statements of common ground are being agreed with these bodies. Recommended changes to the Local Plan to meet their comments are included within the schedule of proposed changes identified in Appendix 3.

### **The Next Steps**

36. The technical studies undertaken since July 2014 support and underpin the recommended changes to the Local Plan. If Council supports the recommendations, the Council can immediately request that the Inspector reconvenes the examination. If Council decides to significantly change the recommended changes to the plan, for example, by introducing a new site

or materially changing the housing distribution strategy, there will need to be a further delay to update the evidence base to assess the implications of these changes.

37. The Inspector has indicated that once the Council has asked him to reconvene Stage 1 of the examination, he is likely to arrange a short hearing session in mid-late January 2015 to assess the outcome of the work. Progress to Stage 2 of the examination and the consideration of the development strategy, site allocations and other policies will depend upon the outcomes of that meeting and the Inspector being satisfied that the Plan can be made sound with modifications, but will commence no earlier than March 2015.
38. All proposed changes to the Local Plan to make the Plan sound will need to be published as modifications to the plan and subject to six weeks of public consultation in accordance with the Local Planning Regulations 2012. The Inspector has indicated that this consultation will take place in spring 2015 and all representations received will be taken into account by the Inspector before he issues his report and recommendations later in the year. It is expected that the Council will be in a position to consider his recommendations and adopt the Local Plan by the end of 2015.
39. If the Inspector were to allow the Local Plan to progress to Stage 2 of the examination, this would provide certainty for decision makers regarding the overall and five year housing requirement for the District and thereby determine whether the current supply and planned supply is sufficient to exceed that requirement. This is important given the context of the number of current planning applications for housing development in the District.
40. At the current time, the Council does not have an up-to-date adopted Local Plan. As a result, under the NPPF, planning applications should be permitted unless any adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF. The Council can give some weight to the emerging Local Plan as it is at an advanced stage of preparation and provided that it continues to progress towards adoption. In particular, agreeing a revised housing requirement which meets the Inspector's concerns demonstrates that the Local Plan meets the full objectively assessed needs for market and affordable housing. It will also help the Council to demonstrate that it has a five year housing supply. In addition, where development proposals are so substantial, or cumulatively so significant, that they predetermine decisions about the scale and location of development that are central to the emerging Local Plan, refusal can be justified provided that the local planning authority identifies clearly how the grant of permission would prejudice the outcome of the plan making process. However, until the Inspector has declared the plan sound and the plan is adopted, the balancing exercise of benefits and impacts needs to be carried out for each application and a negative or positive determination made accordingly.

41. The Local Plan includes a commitment to undertake an early review within five years. This review will be comprehensive and will assess all potential options for future development.

## Appendix 1: Alternative Growth Scenarios

Growth Scenarios			Low	Low	Low	Medium	Medium-High	High	High
Potential sites	Preferred Strategy 2012	Submitted Local Plan 2013	Option A: <b>EXTEND EXISTING SITES</b> Increase/extend existing sites	Option B: <b>STROUD FOCUS</b> Existing sites + additional valley + edge of Stroud + Aston Down	Option C: <b>M5 CATCHMENT: EASTINGTON FOCUS</b> Existing sites + North of Eastington	Option D: <b>ALTERNATIVE M5 CATCHMENT: STONEHOUSE FOCUS</b> Existing sites + West of Stonehouse	Option E: <b>EXTEND EXISTING SITES + STONEHOUSE</b> Increase/extend existing sites + West of Stonehouse	Option F: <b>EXTENDED GROWTH AT PREFERRED STRATEGY AREAS</b> Increase/extend existing sites + additional valley + edge of Stroud + Aston Down + West of Stonehouse	Option G: <b>+ EXTENDED GROWTH AT M5 CATCHMENT</b> Increase/extend existing sites + additional valley + edge of Stroud + Aston Down + West of Stonehouse + Eastington
<b>Existing commitments</b>		7050	7300	7300	7300	7300	7300	7300	7300
<b>Hunts Grove</b>	500-750	500	750	500 - 750	500 - 750	500 - 750	750	750	750
<b>North East Cam</b>	200-500	450	750	450 - 750	450 - 750	450 - 750	750	750	750
<b>Sharpness</b>	200-250	300	300	300	300	300	300	300	300
<b>Stroud Valleys</b>	300-800	300	550* *Additional valley	1150* *Additional valley / Edge of Stroud / Aston Down	400	400	550* *Additional valley	1150* *Additional valley / Edge of Stroud / Aston Down	1150* *Additional valley / Edge of Stroud / Aston Down
<b>North of Eastington</b>					700				700
<b>West of Stonehouse</b>	1000-1500					1350	1350	1350	1350
<b>Council housing</b>		150	150	150	150	150	150	150	150
<b>Windfall</b>		750	750	750	750	750	750	750	750
<b>Total</b>		9500	10550	10600 - 11150	10550 - 11100	11200 - 11750	11900	12500	13200



## Appendix 2: Addressing the Inspector's Initial Conclusions on Stage 1

Inspector's remarks and conclusions	Stroud District Council response
<p>"Overall, this points to the need to undertake further work on establishing an objective assessment of the overall need for housing in the district, <b>having regard to the latest guidance in the NPPF &amp; PPG.</b>"(45).</p>	<p>A new report "Assessing the housing requirements of Stroud, Forest of Dean and Cotswold" has been prepared taking account of the NPPF, the PPG and best practice.</p>
<p>"SDC needs to take account of the <b>relationship with the wider strategic housing market area, particularly within the JCS area</b>, to ensure that the overall assessment is <b>consistent and compatible</b> with the assessment of housing needs in adjoining parts of the strategic housing market area." (45).</p>	<p>The new report, for Cotswold, Forest of Dean and Stroud authorities, has been prepared by Neil McDonald, author of the Joint Core Strategy OAHN report on behalf of Cheltenham, Gloucester and Tewkesbury authorities. This completes the assessment for the whole of the Gloucestershire housing market area. The methodology has been designed to be consistent and compatible with the JCS work.</p>
<p>"..there is <b>no single objective assessment of housing needs</b>; the material is found in several documents, produced at different times and covering differing time frames." (29).</p>	<p>The new report contains the full up-to-date assessment of housing needs for Stroud.</p>
<p>"..methodology is <b>not as transparent</b> as it could be" (29).</p>	<p>The report is designed to be as transparent as possible and includes spreadsheets of data.</p>
<p>"...might be reasonable to expect that the ... <b>households that formed</b> in the years running up to the Census were <b>significantly below the long term trend.</b>" (30).</p>	<p>The report plans for a partial return to trend for the 25-34 year olds – the age group most affected by the recession.</p>
<p>"..<b>unduly pessimistic assumptions about potential economic and employment</b> growth... could put at risk the overall growth strategy..."(34).</p>	<p>The report takes a realistic look at two latest economic forecasts for the District and includes a number of sensitivity tests.</p>
<p>"Furthermore, neither the overall level (9,500) nor the annual rate of housing provision (380 dw/yr) represents a <b>significant boost in housing supply compared with previous rates of completion</b>, as required by the NPPF (¶ 47)." ( 32).</p>	<p>The report recommends an annual delivery rate of 448 p/a which is a significant increase on the annual average rate of completion for the period 1991-2013 (382 p/a) and the submitted draft plan (380 p/a).</p>

<p>“There are also some deficiencies in the <b>justification for the economic and employment strategy</b> of the Plan, and its <b>relationship with the proposed level of housing provision</b> and the <b>wider economic strategy for Gloucestershire, including the latest SEP.</b>” (47).</p>	<p>A report has been prepared by consultants BE Group to reassess the employment land requirements for the District in the light of new economic forecasts and policies of the LEP/SEP. Both this report and the housing assessment critically review the robustness of the new economic forecasts. The housing needs assessment looks at the relationship between employment and housing.</p>
<p>“Further work is also needed to <b>complete all the outstanding technical evidence</b> to ensure that the strategy, including specific site allocations, is fully justified and soundly based, particularly <b>relating to flood risk, waste water, highways and traffic</b>; this will also involve amendments to the <b>Strategic Infrastructure Delivery Plan.</b>” (52).</p>	<p>Further work undertaken since July 2014 includes:</p> <ul style="list-style-type: none"> <li>• SA assessment of growth options</li> <li>• HRA update</li> <li>• SFRA2 update and Sequential Test document update</li> <li>• IDP update</li> <li>• New transport evaluation assessment</li> </ul>
<p>Finally, the <b>detailed amendments to the wording of some of the policies</b> and associated text sought by other prescribed bodies (such as <b>English Heritage, Natural England, Environment Agency and Highways Agency</b>) need to be agreed and finalised.” (52).</p>	<p>Statements of Common Ground and recommended changes to the submitted Local Plan have been agreed with English Heritage, Natural England, Environment Agency and Highways Agency.</p>

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Paragraph / Policy	Proposed Change
2.5	Amend SO4 to "Strategic Objective SO4: Transport and travel Promoting healthier alternatives to the use of the private car and seeking to reduce CO2 emissions by using new technologies, active travel and/or smarter choices working towards a more integrated transport system to improve access to local goods and services." Amend SO5 bullet criterion to "promoting the use of appropriately located brownfield land to support a pattern of development which facilitates the use of sustainable modes of transport."
2.6	Wording change to SO5 to help deliver the objective of the Water Framework Directive (WFD). Criteria should include the protection and enhancement of the water quality and ecology of the district's surface and ground waters. This would help deliver the objectives of the Water Framework Directive (WFD). Biodiversity already part of S06 and not proposed to be repeated here. Therefore added bullet "• Protection and enhancement of the quality of the District's surface and groundwater resources."
2.26 - 2.28	Consequential changes to reflect the new housing needs assessment data identified in the updated evidence base.
2.29	Replace the figure "9,500" with "11,200".
2.30	Replace the figure "9,500" with "11,200". Replace the figure "2,400" with "4000". Update table.
2.34	Add "at Stonehouse" after "at Stroud". Amend table by adding "West of Stonehouse 1350" and "Stroud Valleys 450". Total amended from "at least 2450" to "at least 4000".
2.41	Replace "Growth Plan" with "Strategic Economic Plan" .
2.42	Delete "around 6,200" and replace with "between 6,800 and 12,500". Delete "37 ha" and replace with "58 ha". Delete "2012-2031" and replace with "2006-2031".
2.51	Amend second sentence of para 2.51 to read "For example, the Gfirst LEP Strategic Economic Plan (SEP) (2014) identifies that there are major opportunities for future economic growth along the M5/A38 corridor which is the property market focus for sub-regional industrial and modern office demand".
Policy CP2	Replace first sentence with "Stroud District will accommodate at least 11,200 additional dwellings and 58 hectares of employment land for the period 2006-2031". Amend table to delete Stonehouse 10 ha employment land and replace with "West of Stonehouse 10 ha" employment and "1350 housing. Increase Stroud Valleys from "300" to "450".
Key Diagram	Add location for strategic housing growth notation to west of Stonehouse. Consequential changes to all other diagrams, vision maps and policies map.

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CP4	Amend point 2 of the Policy to read "2. Place-shape and protect or enhance a sense of place (create a place with a locally-inspired or distinctive character – whether historic, traditional or contemporary – using appropriate materials, textures and colours, locally-distinctive architectural styles, working with the site topography, orientation and landscape features; as well as protecting or enhancing local biodiversity, the historic environment and any heritage assets); ...."
CP5	Amend CP5 clause 3 criterion to "3. Be readily accessible by bus, bicycle and foot to shopping and employment opportunities, key services and community facilities. This will contribute towards the provision of new sustainable transport infrastructure to serve the area and seek to minimise the number and distance of single purpose journeys by private cars."
3.8 and 3.9	Amend "300" to "450".
3.8	Add criterion 13 "Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan at this location."
3.9	Add bullet "Habitat Regulations Assessment accompanying the Stroud District Local Plan and National Trust "Management Plan for Rodborough Common"".
3.10.	Add bullets for "Strategic Flood Risk Assessment (Levels 1 and 2) and Flood Risk Sequential Test (2014)" and add "Stroud Infrastructure Delivery Plan (2014)".
3.13	Land at Dudbridge bullet. "• Land at Dudbridge has potential in addition to employment provision, for canal related tourism and retail development provided it is compatible with the retail hierarchy. The site is significantly constrained by functional floodplain and any redevelopment should not result in any net loss of flood storage. Safe and emergency access considerations are paramount and will need to be fully resolved. A new access to the site will be achieved from Dudbridge Road. There is potential to enhance significantly this gateway location into the town and the setting of the canal."
3.13	Ham Mills bullet. "• Ham Mills has potential for apartment housing and high quality office space focussed on achieving the conservation and adaptation of the historic mill and enhancement of its setting. No development should take place in Flood Zones 3a and 3b at the south eastern end of the site. This area will act as a natural buffer to the river. "
3.13	Brimscombe Mill bullet. "• Brimscombe Mill has potential for both housing and employment redevelopment to achieve environmental enhancements and to create a restored mill pond. The site should not be developed until the adjoining Cotswold Canal has been reinstated from Brimscombe Port to the Ocean Bridge or until a site specific Flood Risk Assessment demonstrates that the site can be safely developed with more vulnerable development being located in Flood Zone 1 and without increasing flood risk on or off site."

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3.13	Brimscombe Port bullet. "• Brimscombe Port has opportunities to provide canal related facilities including moorings on a reinstated stretch of water, enhancing listed buildings, providing new visitor facilities as well as housing and high quality employment development. A new access from the A419 to the east of the site will be achieved to improve site accessibility. The site should not be developed until the adjoining Cotswold Canal has been reinstated from Brimscombe Port to Ocean Bridge."
3.13	Wimberley Mills and Dockyard Works bullet. "• Wimberley Mills and Dockyard Works have potential, subject to the relocation of existing businesses, for comprehensive redevelopment for housing and high quality employment space. It is essential that development at Wimberley Mills de-culverts the River Frome to take the site out of the floodplain. Development at Dockyard Works is expected to be phased after the Wimberley development has been completed and to include de-culverting of the Toadsmoor Stream on-site and reinstatement and maintenance of the adjacent Canal channel off site. These measures are to enable development by reducing flood risk and improving river corridor functioning. Development will require a comprehensive solution to achieve satisfactory access through Knapp Lane and Toadsmoor Road to the A419."
Policy SA1	Amend "at least 300" to "at least 450". Amend SA1c Ham Mill from "50" to "100". Amend SA1d Brimscombe Port from "100" to "150". Amend SA1f Wimberley Mills from "50" to "100".
Policy SA1g	Amend criterion 5. by deleting "to meet the requirements of the Environment Agency". Add additional criteria to read: "Adequate and timely infrastructure to tackle wastewater generated by that development in accordance with the Infrastructure Delivery Plan and with agreement of the relevant water companies." Add criteria to read: " Be supported by an acceptable Flood Risk Assessment which also addresses the Flood Risk Sequential Test document recommendations which accompanied this Local Plan." Add criteria "Improvements and restoration of the river corridor for biodiversity and flood risk enhancements."
3.17	Replace first bullet point, second sentence with "Land to the west of Stonehouse will be a focus for the District's strategic growth, providing 1350 homes and up to 2,000 jobs by 2031".
3.17	Add criterion "Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan at this location."
3.18	Replace first bullet point with "1350 new homes plus significant employment development (up to 2,000 jobs) on land to the west of Stonehouse". Add new bullet point: "Provision of new primary school, local centre, community facilities and open space".
3.19	Add "'Strategic Flood Risk Assessment (Levels 1 and 2) and Flood Risk Sequential Test (2014)" and add "Stroud Infrastructure Delivery Plan (2014)".

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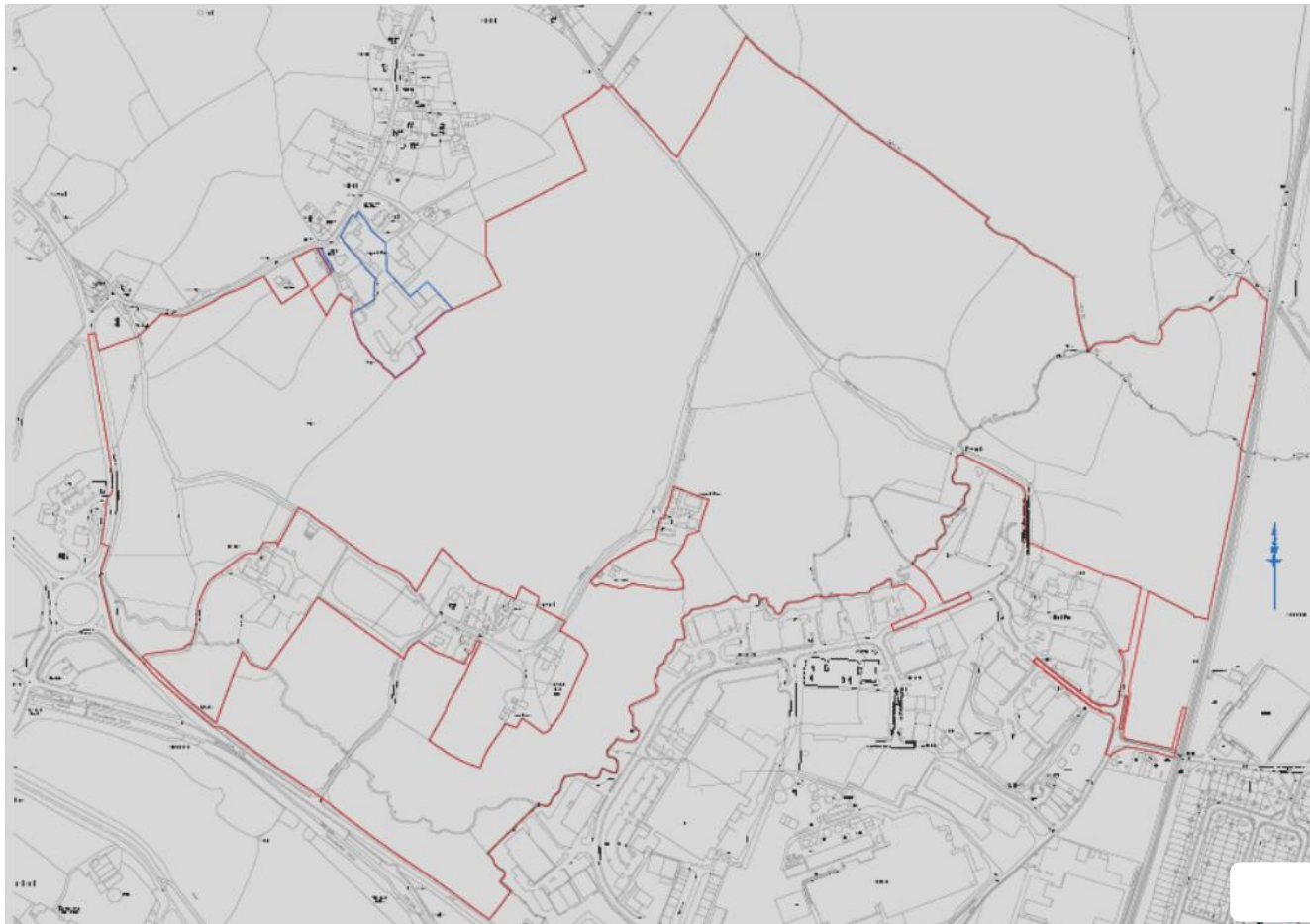
<p>New Policy SA2</p>	<p>Delete current Policy SA2 North of Stonehouse Industrial Estate and map and replace with new Policy SA2 West of Stonehouse:</p> <p>Policy SA2 West of Stonehouse</p> <p>Land west of Stonehouse, as identified on the policies map, is allocated for a mixed use development including residential, employment and community uses. A development brief incorporating a design vision and a masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner. This will address the following:</p> <ol style="list-style-type: none"> <li>1. 1350 dwellings, including at least 405 (30%) affordable dwellings, unless viability testing indicates otherwise.</li> <li>2. 10 hectares of B1, B2 and B8 employment land.</li> <li>3. A local centre incorporating local retail and community uses to meet the needs of the development.</li> <li>4. A 2 form entry primary school and contributions to secondary school provision.</li> <li>5. Contributions to local community services.</li> <li>6. Accessible structural natural greenspace, allotments and formal public outdoor playing space including sports pavilion/community building.</li> <li>7. Structural landscaping buffer around Nastend and to the east of Nupend incorporating existing hedgerows and trees.</li> <li>8. Long term management and maintenance of open spaces to deliver local biodiversity targets.</li> <li>9. The acceptable management, maintenance and disposal of surface water including sustainable urban drainage systems (SuDs).</li> <li>10. Restored watercourse corridor that enhances biodiversity and water quality and improves flood storage and flow routes.</li> <li>11. Adequate and timely infrastructure to tackle wastewater generated by development in agreement with the relevant water companies.</li> <li>12. Opportunities to improve transport connectivity with Stonehouse town centre for pedestrians, cyclists, public transport and private car.</li> <li>13. Cycle and pedestrian routes through the development connecting Nastend and Nupend with the town centre, Stroudwater Industrial Estate and Oldends Lane and footpath links from the development to the surrounding rural network, including improvements to the canal towpath.</li> <li>14. Primary vehicular access from A419 Chipmans Platt roundabout and additional vehicular access from Brunel Way and Oldends Lane.</li> </ol>
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	<ol style="list-style-type: none"><li>15. Traffic calming measures within the development and locality as approved by the Highways Authority</li><li>16. Bus stops and shelters at appropriate locations to serve the new development</li><li>17. Contributions towards bus services to improve bus frequencies and quality and to connect the development with the town centre</li><li>18. Contributions towards the provision of a new railway station at Stonehouse</li><li>19. Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan in this location</li><li>20. Phasing arrangements to ensure that employment land is developed and completed in parallel with housing land completions and community and retail provision is made in a timely manner.</li></ol>
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New Policy SA2 Diagram



3.20 - 3.21

Delete supporting text and replace with:

Land west of Stonehouse is identified as a sustainable urban extension to Stonehouse, which will deliver a high quality mixed use development including housing, employment, local centre and open space that meets the day-to-day needs of its residents.

Land west of Stonehouse is located north of the A419 between the Chipmans Platt roundabout and the



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	<p>Stroudwater Industrial Estate. The site comprises two parcels of land. Land to the south and west of Nastend will be retained primarily in existing uses but offering opportunities for ecological enhancement. The remaining land to the north and east of Nastend and the Industrial Estate will be developed for residential, employment and community uses including landscaping and open space.</p> <p>The site could accommodate 1350 dwellings, incorporating at least 30% affordable housing unless independently scrutinised viability testing indicates otherwise, a local centre and 10 hectares of B1, B2 and B8 employment land.</p> <p>Employment land should include high quality office space and opportunities should be explored for small, incubator and grow on business units and for provision which facilitates industrial symbiosis. Phasing arrangements will be put in place to ensure that employment land is developed and completed in parallel with housing land completions.</p> <p>A local centre will be developed to incorporate local shopping, community uses and a 2 form entry primary school to meet the needs of the development and will be phased to ensure the new community has access to facilities in a timely manner. Contributions will also be required to secondary school provision and community services, for example funding for a community development officer and for extending opening hours at Stonehouse library. Options for additional healthcare provision will be investigated.</p> <p>The site will deliver a high quality sustainable and distinctive mixed use development accommodated in a series of interlinked neighbourhoods within an extensive landscape framework. The design vision and form and design of the main perimeter elevations will be submitted to and agreed by the Council before reserved matters applications can be considered. Subsequent applications will be required to demonstrate how they conform to the design vision and masterplan. This will ensure that design quality is maintained through the build out of the development.</p> <p>The visual setting of Nastend Farm as generally experienced from Nastend Lane will be preserved and structural landscaping around Nastend and to the east of Nupend will maintain the separate character of these settlement areas. Accessible structural natural greenspace, allotments and formal public outdoor playing space in accordance with local standards and to meet needs arising from the development will be provided on-site. Long term management and maintenance of open spaces will be designed to deliver local biodiversity targets, including for orchards, Great-crested Newts and Barn Owls.</p>
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	<p>The Council will seek opportunities to reduce the overall level of flood risk in the area through the layout and form of the development. Development here will need to comply with habitats regulation assessment recommendations and should include the appropriate application of sustainable drainage systems and create space for flooding to occur by improving flood flow pathways and by identifying, allocating and safeguarding open space for flood storage and biodiversity enhancements both on-site and off site.</p> <p>An archaeological evaluation has been carried out on the site and provision will be made for a programme of archaeological mitigation.</p> <p>The site is situated 4.5km east of the Severn Estuary SPA/Ramsar site. Due to the size of the development it will be necessary for the applicants to supply a report to inform a Habitat Regulations Assessment, which will specifically investigate the potential recreational impacts of the new dwellings on the bird populations of the SPA/Ramsar site and consequently detail any measures that may be required to avoid a likely significant effect. Measures could include avoiding an overall increase in usage of the paths along the Estuary by providing alternative dog walking opportunities that would meet the local need, or by contributing to the emerging impact avoidance strategy for the Severn Estuary SPA and Special Area of Conservation (SAC).</p> <p>Vehicular access will be from A419 Chipmans Platt roundabout and from Oldends Lane. Opportunities to improve transport connectivity with Stonehouse town centre will be investigated in accordance with a transport assessment to be submitted with the application. In addition, cycle and pedestrian routes will be provided through the development to Stroudwater Industrial Estate and Oldends Lane and footpaths will link the development to the surrounding rural network. Contributions will be made to ensure the canal towpath between Eastington and Stonehouse can accommodate the predicted increase in usage.</p> <p>Contributions towards improving the frequency and quality of local bus services to connect the development with the town centre will also be provided and towards the provision of a new station at Stonehouse.</p>
3.22	<p>Paragraph 3.22 “Cam and Dursley adjoin each other and make up the District’s second largest population (after the Stroud Valleys). This large conurbation sits nestled at the foot of the Cotswold hills (the AONB covers the southern half of this parish cluster area). The Cotswold Way runs through Dursley town centre, a conservation area which has recently seen some public realm improvements, as well as a major new supermarket development. The market town has a population of over 6,500; whilst Cam has a small village centre, which has expanded to serve its larger population of 8,000+”.</p>

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3.23	Paragraph 3.23 "Both communities historically were a centre for cloth manufacturing. Other industries later boomed in Dursley town, including engine manufacture, furniture production and pin-making. The area has suffered from a degree of deprivation that has impacted on the local communities; according to 2011 census results, this is particularly acute in the area of education, skills and training; while the emerging 2020 Cam and Dursley Community Plan highlights that businesses identify a local skills gap. A residents' survey in 2007 showed long-term worklessness was prevalent in the "Vale Vision" area, with 60.6% of workless respondents having been out of work for 2 years or more. (Vale Vision Development Trust Ltd is a community-led enterprise whose aims include improving and enhancing the quality of life of the inhabitants of Cam, Dursley and the surrounding parishes. They were commissioned to prepare a Community Strategic Plan for Cam, Dursley and surrounding parishes, that covers a population in excess of 18,000)."
3.25	Add criterion "Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan at this location."
3.27	Add ""Strategic Flood Risk Assessment (Levels 1 and 2) and Flood Risk Sequential Test (2014)" and add "Stroud Infrastructure Delivery Plan (2014)"
Policy SA3	Amend criterion 4 by adding "and enhanced flood plain storage capacity." Amend criterion 7. by deleting "to meet the requirements of the Environment Agency". Add criterion 15 relating to "Adequate and timely infrastructure to tackle wastewater and surface water attenuation generated by that development in agreement with the relevant water company including any other constraints referred in the Stroud Infrastructure Delivery Plan."
3.31	Add to supporting text "The Council will seek opportunities to reduce the overall level of flood risk in the area through the layout, use and form of the development which improves flood storage capacity and biodiversity."
3.33	After "natural greenspace" and before "and adjacent" insert ", increased flood storage"
3.39	Amend Criterion 6 to "Improve non-motorised connections between the City suburbs and the rural hinterland; enhance the existing good transport links and movement corridors and allow good permeability through any new development for walkers and cyclists. Development must not have a significant detrimental impact on the safe and efficient operation of Junction 12 of the M5."
3.39	Add criterion "Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan at this location."
3.41	Add ""Strategic Flood Risk Assessment (Levels 1 and 2) and Flood Risk Sequential Test (2014)" and add "Stroud Infrastructure Delivery Plan (2014)".

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Policy SA4	Add criteria relating to "Adequate and timely infrastructure to tackle wastewater generated by that development in agreement with the relevant water company." Add criteria relating to "No built development will be located in Flood Zones 2, 3a and 3b. The Council will also seek opportunities to reduce the overall level of flood risk in the area through the layout, use and form of the development which improves flood storage capacity."
3.44	Amend paragraph 3.44 to read "Development will be brought forward as an extension to the approved Hunts Grove masterplan and will include provisions that support and supplement the approved scheme. There may be opportunities to re-examine some of the masterplanning principles that relate to the approved scheme, as part of the masterplanning of the proposed extension. The objective will be to create a high-quality, sustainable urban extension with a strong sense of place that meets the day-to-day needs of its residents. The areas identified within flood zones 2, 3a and 3b will be kept as open space."
Policy SA4a	Amend policy SA4a to "Land at Quedgeley East (13 hectares), as identified on the proposals map, is allocated for B1-B8 employment uses. The development of the site will provide contributions to off-site highway works including public transport, pedestrian and cycle links to Gloucester city, Stonehouse and Stroud. The development must help to reduce the flood risk to the adjacent M5 Motorway by providing floodplain storage on site and keeping the floodplain and flow paths as open space."
3.47	Insert a new paragraph 3.47a which states "The Council will seek opportunities to reduce the overall level of flood risk in the area including flooding to the M5 motorway, through the layout and form of the development, the appropriate application of sustainable drainage systems and increased flood storage capacity. There will be no built development in flood zones 2, 3a and 3b. If car parking cannot be avoided in flood risk locations it should only be allowed if appropriate management plans are agreed and implemented. The plans must demonstrate appropriate flood resilience measures including safe access and escape routes in the event of a flood. A site specific Flood Risk Assessment will need to accompany any planning application that addresses the recommendations within the Sequential Test Document and the SFRA Level 2."
3.51	Add criterion 7: "Adequate and timely infrastructure to tackle wastewater generated by development in agreement with the relevant water companies." Add criterion 8: "Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan at this location."
3.53	Add "'Strategic Flood Risk Assessment (Levels 1 and 2) and Flood Risk Sequential Test (2014)" and add "Stroud Infrastructure Delivery Plan (2014)".
Policy SA5	At beginning of Policy SA5 insert "Planning applications for Sharpness Docks must ensure no adverse effect will occur on the integrity of the Severn Estuary SAC/SPA/Ramsar site otherwise planning permission will not be granted. Layout and design requirements and the detailed studies required to support the planning application are set out below:"

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Policy SA5	Amend Policy SA5 criterion 7 by deleting "to meet the requirements of the Environment Agency". Amend criterion 8 to "Adequate and timely contributions towards improvements to the wastewater and sewerage network in agreement with the relevant Water Companies." Amend Criterion 10 by adding "including safe access and egress during flood events." Add criterion 14 "A sequential approach to site layout and flood risk, with more vulnerable development will be located within Flood Zone 1."
3.55a	<p>Insert new paragraph 3.55a "The development must be laid out and designed in order to avoid adverse effects on the Severn Estuary SAC/SPA/Ramsar site. New residential units will be located such that the Sharpness Ship Canal separates them from the SAC/SPA/Ramsar site thus avoiding urban pressures such as fly tipping and cat predation. B Class employment will be located wholly to the south of the Estate to maximise its separation from the SAC/SPA/Ramsar site given the potential of this type of development to result in noise and other disturbance. The 'island site' at the north-west of the estate on which up to 50 dwellings, fixed camping and the hotel and holiday lodges will be situated must be delivered in such a way as to ensure that the hotel is adequately screened from the SPA/Ramsar site and that no direct access is possible onto the foreshore from the island.</p> <p>To demonstrate no adverse effect, planning applications for Sharpness Docks must include:</p> <ul style="list-style-type: none"> <li>· A visitor survey of the Severn Estuary SAC/SPA/Ramsar site within the vicinity of Sharpness Docks in order to inform an evaluation of what increase in recreational activity in the SAC/SPA/Ramsar site would result (from the presence of the hotel and campsite in addition to new housing), define management interventions required to ensure no adverse effect and form a basis for future monitoring;</li> <li>· A management plan for protecting the natural environment (focussed on the interest features of the SAC/SPA/Ramsar site), particularly with regard to recreational pressure;</li> <li>· A non-breeding bird survey of the Sharpness Docks site in order to identify any parts of the site which currently constitute important habitat for the SPA/Ramsar site bird populations and set out any necessary mitigation; A management plan for protecting the natural environment (focussed on the interest features of the SAC/SPA/Ramsar site), particularly with regard to recreational pressure;</li> <li>· A non-breeding bird survey of the Sharpness Docks site in order to identify any parts of the site which currently constitute important habitat for the SPA/Ramsar site bird populations and set out any necessary mitigation;</li> <li>· An analysis of construction and operational noise within the SAC/SPA/Ramsar site due to the Sharpness Docks development compared to the current noise baseline and details of any mitigation measures (such as seasonal restrictions on some activities, damping of pile-hammers, or use of close-board fencing during construction) that will be deployed to ensure that disturbance of SPA/Ramsar site birds does not occur;</li> <li>· Careful lighting design, both with regard to security lighting during construction and permanent lighting during occupation, to ensure no increase in illumination of the SAC/SPA/Ramsar site. Lighting levels in the</li> </ul>

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	<p>site should not exceed levels above the ILP classification E1 (Natural Lighting Zone that is intrinsically dark) for the Severn Estuary and its foreshore;</p> <ul style="list-style-type: none"> <li>· Details of potential mitigation measures, such as identifying and securing bird refuge areas within or close to the development area, and of potential on-site management (to mitigate both recreational pressure during the non-breeding period and incidences of fly tipping) that would be undertaken to ensure no adverse effect.</li> <li>· A sediment contamination assessment as part of the marina planning application; and</li> <li>· Landscaping to create appropriate visual and noise buffers between the development and the SPA/Ramsar site.</li> </ul>
3.56	<p>Amend paragraph 3.56 to "Wastewater and sewerage infrastructure at Sharpness has constraints beyond 2020 and the development will be expected to make contributions towards necessary improvements to the networks. The Level 2 SFRA Addendum for Sharpness and the Council's Sequential Test document contain important flood risk advice for developing the site. Key aspects will be ensuring development has safe access and egress in times of flood, locating development outside the floodplain and incorporating space for flood water to reduce flood risk."</p>
Policy SA5a	<p>Amend Policy SA5a to "Land south of Severn Distribution Park (9.8 hectares), as identified on the proposals map, is allocated for B2-B8 employment uses. The development of the site will provide contributions to off-site highway works including flood defences, public transport, biodiversity, pedestrian and cycle links to Newtown, Berkeley and Dursley. Development must be located towards the part of the site at lowest risk in the north eastern extent of the site (Flood Zone 1). Wherever possible, identified hazard risk area should be kept as open space, or the type of development should be compatible with the risk areas. It must also be ensured that safe access and egress to the site can be achieved for the 1 in 200 year climate change scenario."</p>
3.55	<p>Insert new paragraph 3.55a "The development must be laid out and designed in order to avoid adverse effects on the Severn Estuary SAC/SPA/Ramsar site. New residential units will be located such that the Sharpness Ship Canal separates them from the SAC/SPA/Ramsar site thus avoiding urban pressures such as fly tipping and cat predation. B Class employment will be located wholly to the south of the Estate to maximise its separation from the SAC/SPA/Ramsar site given the potential of this type of development to result in noise and other disturbance. The 'island site' at the north-west of the estate on which up to 50 dwellings, fixed camping and the hotel and holiday lodges will be situated must be delivered in such a way as to ensure that the hotel is adequately screened from the SPA/Ramsar site and that no direct access is possible onto the foreshore from the island. To demonstrate no adverse effect, planning applications for Sharpness Docks must include: "</p>

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3.55	<p>Insert criteria (after the preceding change) in the new paragraph 3.55a "</p> <ul style="list-style-type: none"> <li>• A visitor survey of the Severn Estuary SAC/SPA/Ramsar site within the vicinity of Sharpness Docks in order to inform an evaluation of what increase in recreational activity in the SAC/SPA/Ramsar site would result (from the presence of the hotel and campsite in addition to new housing), define management interventions required to ensure no adverse effect and form a basis for future monitoring;</li> <li>• A management plan for protecting the natural environment (focussed on the interest features of the SAC/SPA/Ramsar site), particularly with regard to recreational pressure;</li> <li>• A non-breeding bird survey of the Sharpness Docks site in order to identify any parts of the site which currently constitute important habitat for the SPA/Ramsar site bird populations and set out any necessary mitigation;</li> <li>• An analysis of construction and operational noise within the SAC/SPA/Ramsar site due to the Sharpness Docks development compared to the current noise baseline and details of any mitigation measures (such as seasonal restrictions on some activities, damping of pile-hammers, or use of close-board fencing during construction) that will be deployed to ensure that disturbance of SPA/Ramsar site birds does not occur;</li> <li>• Careful lighting design, both with regard to security lighting during construction and permanent lighting during occupation, to ensure no increase in illumination of the SAC/SPA/Ramsar site. Lighting levels in the site should not exceed levels above the ILP classification E1 (Natural Lighting Zone that is intrinsically dark) for the Severn Estuary and its foreshore;</li> <li>• Details of potential mitigation measures, such as identifying and securing bird refuge areas within or close to the development area, and of potential on-site management (to mitigate both recreational pressure during the non-breeding period and incidences of fly tipping) that would be undertaken to ensure no adverse effect.</li> <li>• A sediment contamination assessment as part of the marina planning application;</li> <li>• A method statement for inter-tidal works will be produced and uncontaminated sediment will not be removed from the estuarine system in order to create the marina;</li> <li>• Intertidal works for the marina will only take place between early April and late August; and • Landscaping to create appropriate visual and noise buffers between the development and the SPA/Ramsar site."</li> </ul>
3.59	<p>Add new paragraph 3.59a which states "The Council will seek opportunities to reduce the overall level of flood risk in the area through the layout and form of the development and financial contributions towards the flood defences and their maintenance where appropriate. Development here will need to comply with habitats regulation assessment recommendations and should include the appropriate application of sustainable drainage systems and create space for flooding to occur by improving flood flow pathways."</p>
3.64	<p>Add criterion 7: "Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan at this location."</p>

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3.66	Add ""Strategic Flood Risk Assessment (Levels 1 and 2) and Flood Risk Sequential Test (2014)" and add "Stroud Infrastructure Delivery Plan (2014)".
3.71	Add criterion 7: "Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan at this location."
3.77	Add criterion 7: "Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan at this location."
5.4	Amend paragraph 5.4 to delete "potentially" in the last sentence.
5.7	Amend first sentence to "The Local Plan will seek to deliver new and improved transport infrastructure, maximising the use of potential links to rail, other public transport systems and the strategic road network (managed by both the Highways Agency and the Highway Authority).
Policy CP11	Amend criterion to "2. Be readily accessible by public transport, bicycle and foot or contribute towards provision of new sustainable transport infrastructure to serve the area in order to make the development accessible by those modes."
Policy CP11	Amend first sentence to "Proposals for major schemes as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2010 will be supported where they:"
5.23	Insert new paragraph: "5.23a The District currently has two major gliding clubs within the District; The Cotswold Gliding Club (CGC) based at Aston Down Airfield, and The Bristol and Gloucester Gliding Club (BGGC) based at Nympsfield. In addition there are several hot air balloon and paragliding sites. The Gliding clubs generate 22500 aircraft movements per annum. Ensuring the safety of such aircraft movements is therefore a consideration that can impact on the planning process. The regulation and management of air safety in the United Kingdom is the responsibility of the CAA. In addition gliding is further regulated by the British Gliding Association (BGA). These statutes, regulations and advice prescribe the routes and heights that aircraft can use, both on route to, and in the vicinity of aerodromes. The Council will seek to ensure that any risks between aircraft movements and proposed developments are removed, both for the safety of the general public and aircrew alike. Both the CGC and BGGC have agreed safeguarding areas. The Council will expect planning proposals to address any relevant potential air safety and or aerodrome operation issues in the vicinity of these airfields."
Policy E11	Delete EK2 and replace with new policy (see below). Consequential changes to policies map.
New Policy EI2a	New policy and supporting text: EI2a The Berkeley Centre "The site will be retained for B1-B8 employment uses and for employment related training and education purposes. Redevelopment for unrelated alternative uses will not be permitted." Consequential changes to policies map.



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5.28a	"The former Berkeley Power Station site includes delicensed office and laboratory accommodation currently providing employment accommodation in a rural location by the River Severn. A major project to develop a GREEN Skills Centre to provide a training centre for STEM skills related to the renewable energy, engineering and nuclear sectors has been promoted by the Gloucestershire gFirst LEP. Proposals for continued B1-B8 uses on the site or that develop the Skills Centre and education uses will be supported. Alternative uses will not be permitted in this rural location."
Policy EI4	Amend criterion 3 by adding "or locality" at the end to comply with the supporting text contained in Paragraph 5.34.
Policy EI11	Add criteria which states 'it is not subject to any other over-riding environmental or other material planning constraints.'
Policy CP15	<p>Amend Core Policy CP15 to "In order to protect the separate identity of settlements and the quality of the countryside (including its built and natural heritage), proposals outside identified settlement development limits will not be permitted except where these principles are complied with:</p> <ol style="list-style-type: none"> <li>1. It is essential to the maintenance or enhancement of a sustainable farming or forestry enterprise within the District; and/or</li> <li>2. It is essential to be located there in order to promote public enjoyment of the countryside and support the rural economy through employment, sport, leisure and tourism; and/or</li> <li>3. It is a 'rural exception site' where development is appropriate, sustainable, affordable and meets an identified local need; and/or</li> <li>4. It is demonstrated that the proposal is enabling development to maintain a heritage asset of acknowledged importance.</li> </ol> <p>Where development accords with any of the four principles listed above, development will only be permitted in the countryside if:</p> <ol style="list-style-type: none"> <li>I. It does not have an adverse impact on heritage assets and their setting;</li> <li>II. It does not lead to excessive encroachment or expansion of development away from the original buildings;</li> <li>III. It proposes to re-use an existing building or buildings, where these are appropriately located and are capable and worthy of conversion. Any such conversion will involve a building that positively contributes to an established local character and sense of place. In the case of replacement buildings they must bring about environmental improvement; or</li> <li>IV. In the case of extensions to buildings it does not result in inappropriate increases in the scale, form or footprint of the original building; or</li> <li>V. In the case of replacement dwellings the proposal must bring about environmental improvements; and not result in inappropriate increases in the bulk, scale, form or footprint of the original building; or</li> <li>VI. In the case of new buildings for essential community facilities, they cannot be accommodated within the</li> </ol>

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	identified settlement development limits or through the re-use/replacement of an existing building."
Policy ES1	<p>Replace Delivery Policy ES1 Sustainable Construction and Energy Efficiency with:          "Delivery Policy ES1 - Sustainable Construction and Design          Sustainable design and construction will be integral to new development in Stroud District. All planning applications should include evidence that the standards below will be addressed:</p> <ul style="list-style-type: none"> <li>• Maximising energy efficiency and integrating the use of renewable and low carbon energy (i.e. in the form of an energy strategy);</li> <li>• Minimisation of waste and maximising of recycling of any waste generated during construction and in operation;</li> <li>• Conserving water resources and minimising vulnerability to flooding;</li> <li>• Efficiency in materials use, including the type, life cycle and source of materials to be used;</li> <li>• Flexibility and adaptability, allowing future modification of use or layout, facilitating future refurbishment and retrofitting;</li> <li>• Consideration of climate change adaptation.</li> <li>• Applications for all development will need to be accompanied by a Stroud District Sustainable Construction Checklist and shall be implemented to meet the agreed targets therein.</li> </ul> <p>All development will be built in accordance with the approved plans and the Sustainable Construction Checklist."</p>
6.13 - 6.18	Replace existing paragraphs 6.13 - 6.18 inclusive with "The UK Government has set a timetable for tightening carbon standards in building regulations to achieve zero carbon residential buildings by 2016 and it is the intention for non-residential buildings to be zero carbon by 2019. The Council will aim to produce an SPD in accordance with any targets or standards at that time.
6.24	Reference be made to the requirements of the WFD with regards to hydropower as it adds value to the supporting text, and suggest the following addition as a 4th bullet point at para 6.24: In the case of hydropower schemes, a Water Framework Directive Compliance Assessment and evidence of discussions with the Environment Agency on requirements of the Environmental Permitting Regulations. Add fourth bullet to state " • In the case of hydropower schemes, a Water Framework Directive Compliance Assessment and evidence of discussions with the Environment Agency on requirements of the Environmental Permitting Regulations."
Policy ES4	<p>Amend Criterion 4 to "Discharge surface runoff not collected for use to one or more of the following, listed in order of priority:</p> <ol style="list-style-type: none"> <li>a. discharge into the ground (infiltration); or where not reasonably practicable,</li> <li>b. discharge to a surface water body; or where not reasonably practicable,</li> </ol>

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	<p>c. discharge to a surface water sewer, highway drain, or another drainage system; or where not reasonably practicable,</p> <p>d. discharge to a combined sewer</p>
Policy ES6	Alter RAMSAR in first sentence to Ramsar. Add to <i>European Sites</i> Paragraph "The Council will expect development proposals to demonstrate and contribute to appropriate mitigation and management measures to maintain the ecological integrity of the relevant European site(s). With specific regard to recreational impacts the Council will use core catchment zones that identify potential impact areas which extend beyond the relevant European site itself. Development proposals within such areas will take account of any relevant published findings and recommendations. There will be further assessment work on the Severn Estuary SPA and SAC that shall include recreational pressure."
Policy ES6	Alter <i>National Sites</i> paragraph to read "Nationally important sites, including Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR), will be safeguarded from development, unless the benefits of the development can be demonstrated to outweigh the identified national importance of the nature conservation interest or scientific interest of the site."
Policy ES6	Alter <i>Protected Species</i> paragraph to read "Development proposals that would adversely affect European Protected Species (EPS) or Nationally Protected Species will not be supported, unless appropriate safeguarding measures can be provided (which may include brownfield or previously developed land (PDL) that can support priority habitats and/or be of value to protected species."
Policy ES6	Add to <i>New Development and the Natural Environment</i> paragraph "The District will have a number of undesignated sites which may still have rare species or valuable habitats. Where a site is indicated to have such an interest, the applicant should observe the precautionary principle and the Council will seek to ensure that the intrinsic value of the site for biodiversity and any community interest is enhanced or at least maintained. Where an impact cannot be avoided or mitigated (including post development management and monitoring), compensatory measures will be sought. The Council may, in exceptional circumstances, allow for biodiversity offsets, to prevent net loss of biodiversity at the District scale. "
Policy ES6	Amend and relocate beginning of untitled final paragraph of the Policy to follow on from the amended <i>New Development and the Natural Environment</i> section of the Policy "Where an impact cannot be avoided or mitigated (including post development management and monitoring), compensatory measures will be sought. The Council may, in exceptional circumstances, allow for biodiversity offsets, to prevent net loss of biodiversity at the District scale."

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6.44	Amend wording to reflect the latest NE and NT position on HRA matters to "The Council will work with neighbouring Severn Estuary authorities to monitor visitor activities and potential disturbance in the Severn Estuary SPA, which may have implications for future environmental management strategies. There is considerable existing evidence and guidance available that is likely to be relevant to green infrastructure planning, including the Gloucestershire Nature Map developed by the Gloucestershire Biodiversity Partnership, the Rights of Way Improvement Plan, town/landscape assessments, and Historic Environment Records. Work currently being undertaken is likely to identify a core recreational catchment zone around the Severn Estuary SAC/SPA/Ramsar site in which development proposals that involve a net increase in housing may be required to contribute to the funding of mitigation measures. Due to its scale and relative proximity to the SPA/SAC/Ramsar site the West of Stonehouse development has been specifically identified as requiring application-level HRA, although it should be possible to provide avoidance and mitigation measures. "
6.45	Amend wording to reflect the latest NE and NT position on HRA matters to "The HRA of the Local Plan and discussion with Natural England and The National Trust have identified measures that will be required on Rodborough Common over the Local Plan period to ensure no adverse effect occurs on the SAC due to the expected population increase within the Stroud Valleys area and associated increase in recreational activity. A consistent 3km core catchment zone has been defined around this SAC to reflect the current patterns of activity based on settlements. The identified Rodborough SAC impacts result from the proposed growth over the Plan period. In this context a small number of visitors from a particular settlement for example will still make an overall contribution to the identified impacts in the HRA. Development proposals within this core catchment zone will be required to contribute to mitigation measures. The Council commits to working with partners to deliver improvements to Rodborough Common SAC through the delivery of measures including installation of new cattle grids, better dog management measures (on site), alternative dog walking opportunities (off site) grassland restoration on the lower slopes and maintenance of parking areas in order to avoid an adverse effect on the integrity of the SAC associated with increased recreational activity over the plan period. The initiatives will be funded through CIL and S106 contributions that contribute towards a SAC Avoidance and Mitigation Strategy. This will identify measures that can include the potential to enhance open space(s) to deflect visits away from the SAC. A Supplementary Planning Document (SPD) will be prepared to provide clarity for developers. Where instead of a bespoke solution, provision is made for contributions to be paid and pooled towards implementing the Avoidance and Mitigation Strategy upon which Natural England has been consulted), the District Council will not require an Appropriate Assessment of the planning application. The SPD will be subject to regular monitoring and review to at least coincide with the Local Plan Review. Common for example as well as with other partner organisations and their work such as the Stroud Valleys Project for example. The initiatives will be funded through CIL and S106 contributions. The Council's Strategy will be monitored and reviewed alongside any Local Plan review."

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6.45	Insert new paragraph 6.45a to read "45aWhere a development includes specific measures to avoid and mitigate its impact upon the SAC and/or SPA, the District Council will in consultation with Natural England, undertake an Appropriate Assessment. This will consider the effect of the proposal on the SAC or SPA and the avoidance and mitigation measures, including size and location of any proposed semi-natural open space."
Policy ES10	Amend wording of Policy ES10 to ensure consistency with NPPF on points 2A, 3, 4 and 5 to: "2A the 68 sites of national archaeological importance (which are designated as Ancient Monuments), any undesignated archaeology of national significance, and the many buildings that are Listed as having special architectural or historic interest" "3. Proposals will be supported which protect and, where appropriate, enhance the heritage significance and setting of locally identified heritage assets, such as buildings of local architectural or historic interest, locally important archaeological sites and parks and gardens of local interest." "4. Proposals will be supported which protect and, where appropriate, enhance key views and vistas, especially of the spires and towers of historic churches and mills."
6.58	Amend Paragraph 6.58 to read "Stroud District has an important legacy of heritage and cultural assets, including over 4,500 listed buildings, 42 conservation areas, 14 registered historic parks and gardens and 68 scheduled monuments. There are a wide range of undesignated historic buildings, archaeological sites and remains, and historic parks and gardens, as well as places, areas and landscapes of historic interest. Information about heritage assets can be found in the Gloucestershire Historic Environment Record (HER). These assets make a significant contribution to the identity of the locality in which they are set, helping to create a sense of place. The Council is committed to protecting and enhancing the District's historic environment and will produce a heritage strategy to supplement the Local Plan. The strategy will positively address the issues and pressures that are facing our heritage assets, including those identified in Chapter 1 of this Plan, and it will set out a programme for the appraisal and management of our conservation areas and the monitoring of any heritage assets "at risk"."
6.58	Insert remainder of text as a separate paragraph 6.58a to read "Applications for development which affect heritage assets and their settings directly or indirectly will need to describe the nature of the significance of the assets affected, and set out hoe development will maintain and enhance heritage assets and their settings in a manner appropriate to that significance. New development should seek opportunities to draw on the historic environment in order to maintain and enhance local character and distinctiveness."
6.60.	Amend Paragraph 6.60 to read "Development proposals that involve any harm to or loss of a heritage asset would require clear and convincing justification, in accordance with the NPPF. A development proposal will not be permitted where substantial harm to an existing or potential heritage asset is likely to occur, unless there are substantial public benefits."

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6.69	Add at end of the paragraph "Green Infrastructure (GI) provision is being discussed between all Gloucestershire district & county councils with the aim of providing a district wide Strategic Framework for GI requirements. The LPA will consider the requirements for GI, in line with the emerging GI Framework, when determining planning applications."
7.6	Delete table and replace with updated table.
Other sections, appendices and maps	Consequential changes to reflect above changes.
Appendix 1	Insert target of ES10 to read "The completion of a Heritage Strategy" Amend ES10 indicators to read " <ul style="list-style-type: none"> <li>• Number of listed buildings</li> <li>• Number of heritage assets at risk</li> <li>• Number of non-designated heritage assets (that can be, but not always "locally listed")</li> <li>• Number of conservation areas with an up to date appraisal and heritage at risk survey</li> <li>• Number of incidences of substantial harm to non designated heritage assets.</li> </ul>
Glossary	Add " <b>Heritage Asset</b> - A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing)."
Glossary	Add " <b>Historic Environment</b> - All aspects of the environment that result from the interaction between people and places through time, including surviving physical remains of past human activity, whether visible, buried or submerged, and landscape and planted or managed flora.
Glossary	Add " <b>Strategic Road Network</b> - The major road network is defined by the Department for Transport as the network of motorways, trunk roads and principal roads that serve the country's strategic transport needs. Motorways and trunk roads (nationally significant A-roads) managed by the Highways Agency make up approximately 20% of the national major road network. The remaining 80% of the major road network consists of principal roads—other A-roads managed by local authorities. For the purposes of this Local Plan we have accepted this definition which includes both major and principal roads."

**STROUD DISTRICT COUNCIL**  
**EXTRAORDINARY MEETING OF COUNCIL**

**AGENDA**  
**ITEM NO**

**9 DECEMBER 2014**

**4**

<b>Report Title</b>	<b>STROUD VALLEYS INITIATIVE</b>
<b>Purpose of Report</b>	To outline a strategic approach to tackling flood management and regeneration issues within the Stroud Valleys.
<b>Decision(s)</b>	Council RESOLVES; 1. To agree the concept of a Stroud Valleys Initiative, 2. To consider the financial planning issues during the budget setting process in January, and 3. The Strategy and Resources Committee to take responsibility for future decision-making in respect of the project delivery.
<b>Consultation and Feedback</b>	Preliminary discussions have taken place with the Environment Agency, Homes and Communities Agency and the GFirst Local Enterprise Partnership. The County Council has also been made aware of this initiative. These organisations are supportive of the Council's approach to undertake a strategic initiative that tackles flood risks and delivers regeneration within the Stroud Valleys. The prospect of new homes and jobs is relevant to the Council's consideration of its Local Plan.
<b>Financial Implications and Risk Assessment</b>	There are no direct financial implications arising from this report. However, this report asks members to agree the concept of the Stroud Valleys Initiative, with consideration of the financial planning issues to be addressed as part of the Council's budget and Medium Term Financial Plan in January 2015. This report highlights a need to make a financial commitment to fund feasibility studies in order to 'kick-start' the project. The report also outlines a potential cost of £3 million over 3 years for the project.

<b>Financial Implications and Risk Assessment</b>	<p>The Budget Strategy and Medium Term Financial Plan, as presented to Strategy and Resources Committee on 02 October 2014, showed a funding gap of £5.6 million over the life of the plan, with a commitment to achieve savings of £4 million over the same period.</p> <p>David Stanley – Accountancy Manager  Tel: 01453 754100  Email: <a href="mailto:david.stanley@stroud.gov.uk">david.stanley@stroud.gov.uk</a></p>
<b>Legal Implications</b>	<p>District Councils have discretionary powers to undertake flood alleviation/management measures. Direct intervention in the form of physical works and management will naturally bring with it risks in terms of liability to third parties. A strategic approach should therefore involve careful consideration of those risks and methods of mitigating and/or insuring against them.</p> <p>Alan Carr, Solicitor  Tel: 01453 754357  Email: <a href="mailto:alan.carr@stroud.gov.uk">alan.carr@stroud.gov.uk</a></p>
<b>Report Author</b>	<p>David Hagg, Chief Executive  Tel: 01453 754290  Email: <a href="mailto:david.hagg@stroud.gov.uk">david.hagg@stroud.gov.uk</a></p>
<b>Options</b>	<p>There are other options to the one recommended;</p> <p><b>1. The Council could decide to do nothing about these issues.</b></p> <p>There would be no strategic, co-ordinated approach. Any progress would depend on a piecemeal ‘site by site’ approach largely initiated by owners and developers. This may impinge upon delivery of sites in the Local Plan. The Council would be recognising that its ‘Jobs and Growth’ agenda would be limited in scope and impact.</p> <p><b>2. Reliance on other agencies e.g. Environment Agency to progress a strategic approach</b></p> <p>Current Environment Agency policy is to object to regeneration and development in the flood plain. The Agency does not plan to carry out works to reduce flooding risk. Tackling flood management on a site by site basis is more expensive. This may impinge upon delivery of sites in the Local Plan.</p> <p><b>3. Invite other agencies to take the ‘lead’</b></p> <p>Whilst the Environment Agency, Homes and Communities Agency and the County Council (as flood management authority) are willing to support the Council’s initiative, preliminary discussions confirm that none of them would wish to lead such a project given its scale (limited in their terms) and</p>



	<p>priorities elsewhere. As was the case with the canal project, others are willing to be involved and support (in kind or financially) but it is for the Council to take the leadership role.</p> <p><b>4. Reliance on the private sector</b></p> <p>There is no evidence that this is feasible. No one company has a significant stake in the Stroud Valleys sites. Setting up a joint venture company, a 'mini' development agency, or a business improvement/enterprise zone is unlikely to be appropriate.</p>
<b>Performance Management Follow Up</b>	Based on the Council agreeing the concept, an appropriate sum will be identified for consideration at budget setting in January. Further detailed reports on the initiative will be brought to Strategy and Resources Committee in early 2015.
<b>Background Papers/ Appendices</b>	None used to prepare the report.

#### Stroud Valleys Initiative

1. As part of the vision to 2031, the Local Plan states “the Stroud Valleys will continue to be an important focus for the District, as well as seeing some of its residential communities grow.... the regeneration of the industrial valley bottoms and the restoration of the Cotswold Canal will provide a new lease of life....”. The vision is “regeneration, creativity and cultural blossoming in the green valleys”.
2. There are a string of sites in the Stroud Valleys, often former mills, designated for mixed use development. Many of these regeneration sites are critical to our ‘Jobs and Growth’ agenda. Compared to green field sites, there are infrastructure requirements that make some sites problematic and costly to develop and therefore affect their viability. One issue affecting many is flood risk associated with the River Frome. The need for flood attenuation measures adds substantially to infrastructure costs.
3. This issue could be addressed on a site by site basis. Alternatively, a more comprehensive and potentially cost effective approach could be to provide/deliver a strategic solution for the Frome floodplain. One option would be to consider ‘upstream’ storage solutions, other options could also consider using parts of the valley bottom for flood attenuation in the form of flood meadow. Some of this area is already performing this function on an ad hoc basis, but a comprehensive strategic catchment management plan together with the inclusion of other strategic sites could bring significant benefit and may alleviate ‘downstream’ flooding risks.
4. All this requires commitment and co-operation between the various key agencies. Initial discussions have taken place with the Environment

Agency (EA), the Homes and Communities Agency and GFirst LEP. The EA have expressed support for managing this issue on a strategic catchment wide basis. All agencies consider the Council's initiative to be a positive step to bring about regeneration and deliver the aims set out in the Local Plan.

5. A very preliminary figure of £3 million over 3 years has been identified as the project cost. The Council will need to 'kick start' such a project by making a financial commitment to undertake the necessary feasibility studies. This can be considered as part of the Council's budget setting in January.
6. A strategic scheme will support the regeneration of sites set out in the Local Plan's Core Policy CP2, Site Allocations Policy SA1 and Employment Delivery Policies EI1 and EI2. This could help deliver 500 homes and 500 jobs in the Stroud Valleys, as proposed in the Local Plan. It may also prompt other opportunities that can be considered during the next review of the Local Plan. This will take place within 5 years of the Local Plan being adopted.
7. The Council has a track record of major infrastructure projects of this nature. Its experience and success with the Cotswold Canal restoration and Littlecombe, Dursley (a valley bottom scheme that involves opening up the River Cam again) are obvious examples.