



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



**SA Report (Draft Version)**

July 2013

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	July 2013	Draft SA Report presented to members prior to being finalised for publication alongside the Pre-submission version of the plan	Mark Fessey Senior Consultant	Steve Smith Technical Director	Steve Smith Technical Director

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## INTRODUCTION

## 1 BACKGROUND

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

## 2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.<sup>2</sup>
- 2.1.2 The Regulations require that a report is published for consultation alongside the draft plan that *'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'*. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 2.1.3 In-line with the Regulations the report - which for the purposes of SA is known as **the 'SA Report'** – must essentially answer **four questions**:
1. What's the scope of the SA?
  2. What has Plan-making / SA involved up to this point?
    - Preparation of the draft plan must have been informed by at least one earlier plan-making / SA iteration. 'Reasonable alternatives' must have been appraised.
  3. What are the appraisal findings at this current stage?
    - i.e. in relation to the draft plan.
  4. What happens next?
- 2.1.4 These questions are derived from Schedule 2 of the Regulations, which present 'the information to be provided within the report. **Table 1.1** 'makes the links' between the Schedule 2 requirements and the four SA questions.

## 3 STRUCTURE OF THIS DRAFT SA REPORT

- 3.1.1 This document - once finalised (see Box 1.1) – will be the Stroud Local Plan SA Report. As such, there is a need to answer the four SA questions in turn.

### *Box 1.1: Explanation of the 'draft' status of this report*

This report is prepared for the benefit of elected members at Stroud District Council with a view to informing final consideration of the plan prior to publication.

This draft version of the SA Report will be published as the final version (subject to any minor changes) if it is the case that elected member consideration does not lead to significant changes being made to the plan.

If significant changes are made to the plan then Part 3 of this report (*'What are the appraisal findings at this current stage?'*) will be updated as necessary. It may also be appropriate to update Part 2 (*'What has Plan-making / SA involved up to this point?'*) if there is a 'story to tell' about the reasons behind the changes (e.g. if changes were made on the basis of the findings presented in this draft version of the SA Report).

<sup>1</sup> Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2012).

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



Table 1.1: Questions that must be answered within the SA Report

SA REPORT QUESTION	SUB-QUESTION	SCHEDULE II REQUIREMENT (THE REPORT MUST INCLUDE...)
<b>What's the scope of the SA?</b>	What's the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
	What's the sustainability 'context'?	<ul style="list-style-type: none"> <li>The relevant environmental protection <b>objectives</b>, established at international or national level</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</li> </ul>
	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>The relevant <b>aspects of the current state</b> of the environment and <b>the likely evolution thereof</b> without implementation of the plan'</li> <li>The environmental <b>characteristics</b> of areas likely to be significantly affected</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</li> </ul>
	What are the key issues that should be a focus of SA?	<ul style="list-style-type: none"> <li>Any existing environmental <b>problems</b> / <b>issues</b> which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</li> </ul>
<b>What has plan-making / SA involved up to this point?</b>		<ul style="list-style-type: none"> <li>An outline of the reasons for selecting the <b>alternatives</b> dealt with (and thus an explanation of why the alternatives dealt with are 'reasonable')</li> <li>The likely significant effects on the environment associated with <b>alternatives</b></li> <li>An outline of the reasons for selecting preferred options / a description of how environmental objectives and considerations are reflected in the draft plan.</li> </ul>
<b>What are the appraisal findings at this current stage?</b>		<ul style="list-style-type: none"> <li>The likely significant effects on the environment associated with <b>the draft plan</b></li> <li>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing <b>the draft plan</b></li> </ul>
<b>What happens next?</b>		<ul style="list-style-type: none"> <li>A description of the monitoring measures envisaged</li> </ul>

N.B. The right-hand column of Table 1.1 does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation. This interpretation is explained in **Appendix I** of this report.

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

## 4 INTRODUCTION (TO PART 1)

4.1.1 This is Part 1 of the SA Report, the aim of which is to introduce the reader to the scope of the SA. In particular, and as required by the Regulations<sup>3</sup>, this Chapter answers the series of questions below.

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

4.1.2 **Chapter 5** answers the first question by listing the Local Plan-objectives.

4.1.3 The other three scoping questions are answered in **Chapters 6 - 8**, with each question answered for the following 11 sustainability 'topics':

- Air
- Biodiversity
- Climate change mitigation
- Community and wellbeing
- Economy and employment
- Housing
- Landscape and cultural heritage
- Soil
- Transport and accessibility
- Waste
- Water (inc. flood risk)

## 4.2 Consultation on the scope

4.2.1 The Regulations require that: *'When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies'*. In England, the consultation bodies are Natural England, The Environment Agency and English Heritage.<sup>4</sup> As such, these authorities - and wider stakeholders - were consulted on the scope of the JCS SA in **2007**. In **2009** the Council then undertook a review of the SA scope (including through consultation). The 2009 Scoping Report is available here – [http://www.stroud.gov.uk/info/plan\\_strat/scoping\\_report.pdf](http://www.stroud.gov.uk/info/plan_strat/scoping_report.pdf). Consultation responses made in relation to this document are available here - [http://www.stroud.gov.uk/info/plan\\_strat/consultation\\_response\\_analysis.pdf](http://www.stroud.gov.uk/info/plan_strat/consultation_response_analysis.pdf).

4.2.2 The 2009 Scoping Report provides an agreed 'basis' for appraisal; however, it is important to note that our understanding of the appropriate 'scope' for the appraisal has not remained entirely static since that time. This is appropriate given that understanding of sustainability problems/issues/objectives inevitably evolves over time.

<sup>3</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>4</sup> In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme'*.



## 5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The SA Report must include...

- An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes

5.1.1 The new Local Plan, once adopted, will present a spatial strategy for the District up to 2026. It will determine the distribution of various kinds of development around the District and will provide a policy framework that will ultimately provide the basis for a wide range of planning decisions in the future.

5.1.2 The principal influence on plan preparation is the National Planning Policy Framework (NPPF), which sets out a suit of National policies that Local Plans must adhere to. The Local Plan is also developed in-light of the plans of neighbouring authorities (adopted and emerging). This is important given the 'Duty to Cooperate' established by the Localism Act 2011. There is a particular need for Stroud to cooperate closely with Gloucester City Council.

### 5.2 Plan objectives

5.2.1 The six principal objectives are:

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

### 5.3 What's the plan not trying to achieve?

5.3.1 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). The strategic nature of the plan is reflected in the scope of the SA.

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

The SA Report must include...

- The relevant sustainability objectives, established at international / national level
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance

### 6.1 Introduction

6.1.1 An important step when seeking to establish the appropriate 'scope' of an SA involves reviewing 'sustainability context' messages. From the SEA Directive it is understood that there is a need to focus on context messages relating to:

- Broad problems / issues; and
- Objectives
  - i.e. 'things that are aimed at or sought'.

6.1.2 Set out below is an update to the context review presented within the 2009 Scoping Report.

### 6.2 Air

6.2.1 The EU Thematic Strategy on Air Pollution<sup>5</sup> aims to cut the annual number of premature deaths from air pollution-related diseases by almost 40% by 2020 (using 2000 as the base year), as well as substantially reducing the area of forests and other ecosystems suffering damage from airborne pollutants.

6.2.2 The National Planning Policy Framework (NPPF) identifies that there is a need to: prevent "both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability".

6.2.3 The NPPF identifies that "Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas".

6.2.4 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland<sup>6</sup> sets health-based objectives for nine main air pollutants<sup>7</sup>. Performance against these objectives is monitored where people are regularly present and might be exposed to air pollution.

6.2.5 The recent Defra report Action for air quality in a changing climate<sup>8</sup> focuses on the synergies between the two issues of air quality and climate change. In particular, it notes the potential for additional health benefits through the closer integration of climate and air pollution policy. It is suggested that co-benefits can be realised through a variety of means, including promoting low-carbon vehicles and renewable energy.

<sup>5</sup> Commission of the European Communities (2005) Thematic Strategy on air pollution [online] available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2005:0446:FIN:EN:PDF> (accessed 07/2013)

<sup>6</sup> Defra (2007) Air Quality Strategy for England, Scotland, Wales and Northern Ireland [online] available at: <http://www.defra.gov.uk/environment/quality/air/air-quality/approach/> (accessed 07/2013)

<sup>7</sup> Benzene; 1,3-butadiene; carbon monoxide (CO); lead; nitrogen dioxide (NO<sub>2</sub>); ozone; particles (PM<sub>10</sub>); sulphur dioxide (SO<sub>2</sub>); and polycyclic aromatic hydrocarbons.

<sup>8</sup> Defra (2010) Air Pollution: Action in a Changing Climate [online] available at: <http://www.defra.gov.uk/publications/files/pb13378-air-pollution.pdf> (accessed 07/2013)

### 6.3 Biodiversity

- 6.3.1 The EU Sustainable Development Strategy<sup>9</sup>, adopted in 2006, included an objective to halt the loss of biodiversity by 2010. More recently at the European level, a new EU Biodiversity Strategy<sup>10</sup> (May 2011) established a Europe-wide target to “*halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020*”.
- 6.3.2 Key messages from the National Planning Policy Framework (NPPF) include -
- Contribute to the Government’s commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible.
  - Promote the ‘preservation, restoration and recreation of priority habitats, ecological networks’ and the ‘protection and recovery of priority species’. Plan for biodiversity at a landscape-scale across local authority boundaries.
  - Set criteria based policies for the protection of internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.
  - Take account of the effects of climate change in the long term. Adopt proactive strategies to adaptation and manage risks through adaptation measures including green infrastructure.
  - Green infrastructure is defined as being: ‘*a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities*’. Positive planning for ‘green infrastructure’ is recognised as part of planning for ‘ecological networks’. High quality open spaces should be protected or their loss mitigated, unless a lack of need is established.
- 6.3.3 There is a need to focus on the conservation of biodiversity over large areas of land (i.e. at the landscape scale) where habitat patches that are now fragmented would once have functioned more as an interconnected whole. There is a need to protect and maximise the value of areas already rich in wildlife; expand, buffer, and create connections and stepping stones between these areas; and make the wider landscape more permeable to wildlife.<sup>11</sup>
- 6.3.4 New development should incorporate green space consisting of a ‘network of well-managed, high-quality green/open spaces linked to the wider countryside’. These spaces should be of a range of types (e.g. community forests, wetland areas and public parks) and be multifunctional, for instance as areas that can be used for walking and cycling, recreation and play, supporting of wildlife, or forming an element of an urban cooling and flood management system.<sup>12</sup>

<sup>9</sup> Council of the European Union (2006) The EU Sustainable Development Strategy [online] available at: <http://register.consilium.europa.eu/pdf/en/06/st10/st10117.en06.pdf> (accessed 07/2013)

<sup>10</sup> European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: [http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/2020/1\\_EN\\_ACT\\_part1\\_v7%5b1%5d.pdf](http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/2020/1_EN_ACT_part1_v7%5b1%5d.pdf) (accessed 07/2013)

<sup>11</sup> The Wildlife Trusts (2010) A Living Landscape: play your part in nature’s recovery [online] available at: <http://www.wildlifetrusts.org/alivinglandscape> (accessed 07/2013)

<sup>12</sup> TCPA (2012) Creating garden cities and suburbs today [online] available at: [http://www.tcpa.org.uk/data/files/Creating\\_Garden\\_Cities\\_and\\_Suburbs\\_Today.pdf](http://www.tcpa.org.uk/data/files/Creating_Garden_Cities_and_Suburbs_Today.pdf) (accessed 07/2013)

## 6.4 Climate change mitigation

- 6.4.1 Key messages from the National Planning Policy Framework (NPPF) include -
- Support the transition to a low carbon future in a changing climate as a ‘core planning principle’.
  - There is a key role for planning in securing radical reductions in GHG, including in terms of meeting the targets set out in the Climate Change Act 2008<sup>13</sup>. Specifically, planning policy should support the move to a low carbon future through:
    - planning for new development in locations and ways which reduce GHG emissions
    - actively supporting energy efficiency improvements to existing buildings
    - setting local requirements for building’s sustainability in a way that is consistent with the Government’s zero carbon buildings policy
    - positively promoting renewable energy technologies and considering identifying suitable areas for their construction
    - encouraging those transport solutions that support reductions in greenhouse gas emissions and reduce congestion.
- 6.4.2 In the guidance document *How local authorities can reduce emissions and manage climate risk*<sup>14</sup> planning functions are described as being a ‘key lever in reducing emissions and adapting localities to a changing climate’, with it considered particularly important that local authorities use these to:
- Enforce energy efficiency standards in new buildings and extensions;
  - Reduce transport emissions by concentrating new developments in existing cities and large towns and/or ensuring they are well served by public transport;
  - Work with developers to make renewable energy projects acceptable to local communities;
- 6.4.3 With regards to low-carbon district heating networks, the DECC report *The future of heating*<sup>15</sup> points out that around half (46%) of the final energy consumed in the UK is used to provide heat, contributing roughly a third of the nation’s greenhouse gas emissions. Renewable heat currently represents 1% of heat generation in the UK. The Government’s vision is of: *‘buildings benefiting from a combination of renewable heat in individual buildings, particularly heat pumps, and heat networks distributing low carbon heat to whole communities...focusing first on the energy efficiency of our buildings...’*

## 6.5 Community and wellbeing

- 6.5.1 A ‘core planning principle’ of the National Planning Policy Framework (NPPF) is to ‘take account of and support local strategies to improve health, social and cultural wellbeing for all’ and support vibrant and healthy communities. Protection and promotion of town centres is encouraged; and planning policies should promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship. Ensuring ‘sufficient choice of school places’ is of ‘great importance’. To this end, local authorities are called upon to take a ‘proactive, positive and collaborative approach’ to bringing forward ‘development that will widen choice in education’.

<sup>13</sup> The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline.

<sup>14</sup> Committee on Climate Change (2012) *How local authorities can reduce emissions and manage climate risk* [online] available at: [http://hmccc.s3.amazonaws.com/Local%20Authorites/1584\\_CCC\\_LA%20Report\\_bookmarked\\_1b.pdf](http://hmccc.s3.amazonaws.com/Local%20Authorites/1584_CCC_LA%20Report_bookmarked_1b.pdf) (accessed 11/2012)

<sup>15</sup> DECC (2012) *The Future of Heating: A strategic framework for low carbon heat in the UK* [online] available at: <http://www.decc.gov.uk/assets/decc/11/meeting-energy-demand/heat/4805-future-heating-strategic-framework.pdf> (accessed 11/2012)

- 6.5.2 There is “*overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities*”<sup>16</sup>. To ensure that the built environment promotes health and reduces inequalities for all local populations there is a need to:
- fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality;
  - prioritise policies and interventions that both reduce health inequalities and mitigate climate change by improving active travel; good quality open and green spaces; the quality of food in local areas; and the energy efficiency of housing; and
  - support locally developed and evidence-based community regeneration programmes that remove barriers to community participation and action; and reduce social isolation.
- 6.5.3 Travellers should be treated in a fair and equal manner that facilitates their traditional and nomadic way of life, whilst also respecting the interest of the settled community, through promoting more private traveller site provision, whilst recognising that there will be those that cannot afford private sites; enabling the provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and having due regard for the protection of local amenity and environment.<sup>17</sup>
- 6.5.4 Organisations involved in urban planning will need to adjust to an older population and will have an important role to play in preventing the social isolation of older citizens. 51% more people aged 65 and over and 101% more people aged 85 and over in England in 2030 compared to 2010; and a 90% increase in people with moderate or severe need for social care for the same time period.<sup>18</sup>

## 6.6 Economy and employment

- 6.6.1 Key messages from the National Planning Policy Framework (NPPF) include -
- The planning system can make a contribution to building a strong, responsive economy by ‘ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure’.
  - There is a need to capitalise on ‘inherent strengths’, and to meet the ‘twin challenges of global competition and of a low carbon future’.
  - There is a need to support new and emerging business sectors, including positively planning for ‘clusters or networks of knowledge driven, creative or high technology industries’.
  - There is a need for positive planning policies to support competitive town centre environments. The need to enhance and retain markets is also outlined. Edge of town developments should only be considered where they have good access. This should be followed with an impact assessment to ensure town centre viability in the long term.
  - Local Plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas and promote the development and diversification of agricultural and other land-based rural businesses.

### 6.6.2 [Insert discussion of Gloucestershire Local Enterprise Partnership (GFirst LEP) objectives etc.]

<sup>16</sup> The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at: <http://www.nice.org.uk/nicemedia/live/12111/53895/53895.pdf> accessed 08/2012)

<sup>17</sup> DCLG (2012) Planning policy for traveller sites [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/2113371.pdf> (accessed 08/2012)

<sup>18</sup> Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> (accessed 07/2013)

- 6.6.3 Specific examples of areas where it makes sense for Government intervention to tackle market failures include: investment in infrastructure; tackling barriers such as transport congestion and poor connections; other support to areas facing long term growth challenges where this can help them manage their transition to growth industries; and strategic intervention where it can stimulate private sector investment in new green technology in strategic locations.<sup>19</sup>
- 6.6.4 In order to revitalise town centres and high streets it is necessary for Local Authorities to re-imagine these places, ensuring that they offer something new and different that neither out-of-town shopping centres nor the internet can offer, rather than simply relying on retail provision.<sup>20</sup> Also, lower order retail and service facilities, which provide neighbourhood level provision, can provide economic resilience, act as a 'hub' for local communities, and play an important role in the shopping hierarchy because of their accessibility.<sup>21</sup>
- 6.6.5 Local plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas and promote the development and diversification of agricultural and other land-based rural businesses. The improvement of transport links and the provision of adequate digital infrastructure can facilitate the 'significant untapped potential' of rural areas to contribute to economic growth and employment.<sup>22</sup>

## 6.7 Housing

- 6.7.1 Key messages from the National Planning Policy Framework (NPPF) include -
- To 'boost significantly the supply of housing', local planning authorities should meet the 'full, objectively assessed need for market and affordable housing' in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.
  - With a view to creating 'sustainable, inclusive and mixed communities' authorities should ensure provision of affordable housing onsite or externally where robustly justified.
  - Plans for housing mix should be based upon 'current and future demographic trends, market trends and the needs of different groups in the community'.
  - Larger developments are suggested as sometimes being the best means of achieving a supply of new homes, with these to be developed in accordance with the 'principles of Garden Cities'.
  - In rural areas, when exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
  - The NPPF attaches great importance to the design of the built environment. It explains how good design is a key aspect in sustainable development, and how development should improve the quality of the area over its lifetime, not just in the short term. Good architecture and landscaping are important, with the use of design codes contributing to the delivery of high quality outcomes. Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places.

<sup>19</sup> BIS (2010) Local Growth White Paper [online] available at <http://www.bis.gov.uk/assets/BISCore/economic-development/docs/L/cm7961-local-growth-white-paper.pdf>

<sup>20</sup> High streets at the heart of our communities: The Government's response to the Mary Portas Review [online] available at: <http://www.communities.gov.uk/publications/regeneration/portasreviewresponse> (accessed 08/2012)

<sup>21</sup> DCLG (2012) Parades of shops: towards an understanding of performance and prospects [online] available at: <http://www.communities.gov.uk/documents/regeneration/pdf/2156925.pdf> (accessed 08/2012)

<sup>22</sup> Federation of Small Businesses (2012) The Missing Links - Revitalising our rural economy [online] available at: [http://www.fsb.org.uk/policy/assets/rural\\_report\\_web\\_final\\_proof.pdf](http://www.fsb.org.uk/policy/assets/rural_report_web_final_proof.pdf) (accessed 08/2012)



6.7.2 The Joseph Rowntree Foundation *International Review of Land Supply and Planning Systems*<sup>23</sup> explores whether policies and mechanisms that work well in other countries might be introduced or adapted to help unlock land supply and therefore new housing delivery in the UK. Despite record house prices in the early 2000s the supply of new homes did not increase significantly. This lack of responsiveness to increases in house prices contributes further to affordability problems. The global financial crisis and resultant recession(s) has only worsened the supply situation. The consequences of housing market volatility and shortage are increasingly serious.

6.7.3 The housing market is delivering much less specialist housing for older people than is needed. Central and local government, housing associations and house builders need urgently to plan how to ensure that the housing needs of the older population are better addressed and to give as much priority to promoting an adequate market and social housing for older people as is given to housing for younger people.<sup>24</sup>

## 6.8 Landscape and cultural heritage

6.8.1 The National Planning Policy Framework (NPPF) states that Local planning authorities should set out strategic policies to deliver the conservation and enhancement of the natural and historic environment, including landscape.

6.8.2 The NPPF goes on to say that:

- Local Plans should present a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk. Assets should be recognised as being an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ that conservation can bring, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- The planning system should also protect and enhance valued landscapes. Particular weight is given to ‘conserving landscape and scenic beauty’ within Areas of Outstanding Natural Beauty (AONBs).

6.8.3 Local Authorities should adopt policies and measures for the protection, management and planning of all landscapes, whether outstanding or ordinary, that determine the quality of people’s living environment.<sup>25</sup>

6.8.4 **[Insert discussion of Cotswolds AONB Management Plan objectives etc.]**

<sup>23</sup> Joseph Rowntree Foundation (2013) *International Review of Land Supply and Planning Systems* [online] available at: <http://www.jrf.org.uk/sites/files/jrf/land-supply-planning-full.pdf> (accessed 04/2013)

<sup>24</sup> Select Committee on Public Service and Demographic Change (2013) *Ready for Ageing?* [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> [accessed 15/03/2012]

<sup>25</sup> Council of Europe (2000) *The European Landscape Convention* [online] available at: <http://conventions.coe.int/Treaty/en/Treaties/Html/176.htm> (accessed 08/2012)

## 6.9 Soil

- 6.9.1 Key messages from the National Planning Policy Framework (NPPF) include -
- Protect and enhance soils.
  - Prevent new or existing development from being ‘adversely affected’ by the presence of ‘unacceptable levels’ of soil pollution or land instability and be willing to remediate and mitigate ‘despoiled, degraded, derelict, contaminated and unstable land, where appropriate’.
  - Authorities can ‘set out their own approach to housing density to reflect local circumstances’ but should also look to ‘encourage the effective use of land’ through the reuse of land which has been previously developed, ‘provided that this is not of high environmental value’.
  - The value of best and most versatile agricultural land should also be taken into account.
- 6.9.2 In *Safeguarding our Soils: A strategy for England*<sup>26</sup>, a vision is set out for the future of soils in the country. An element of this vision is the condition of soils in urban areas, which are to be ‘sufficiently valued for the ecosystem services they provide and given appropriate weight in the planning system’. Good quality soils in urban areas are recognised as being ‘vital in supporting ecosystems, facilitating drainage and providing urban green spaces for communities’. That planning decisions take sufficient account of soil quality is a concern of the report, in particular in cases where ‘significant areas of the best and most versatile agricultural land are involved’. Preventing the pollution of soils and addressing the historic legacy of contaminated land is another element of the reports vision. Changing demands on our soils need to be better understood and it must be ensured that ‘appropriate consideration is given to soils in the planning process’.

## 6.10 Transport and accessibility

- 6.10.1 Key messages from the National Planning Policy Framework (NPPF) include -
- To minimise journey lengths for employment, shopping, leisure and other activities, planning policies should aim for ‘a balance of land uses’. Wherever practical, key facilities should be located within walking distance of most properties.
  - The transport system needs to be balanced in favour of sustainable transport modes (including walking, cycling and public transport), giving people a real choice about how they travel. Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.
  - Planning for transport and travel will have an important role in ‘contributing to wider sustainability and health objectives’.
- 6.10.2 Higher levels of walking and cycling could reduce congestion, improve local environmental quality, improve personal health and reduce transport-related CO<sub>2</sub> emissions<sup>27</sup>. Plans should ensure that local, strategic policies support and encourage both walking and cycling.<sup>28</sup>

## 6.11 Waste

- 6.11.1 The Government’s Review of Waste Policy in England’ (2011) recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials. As such, it sets out a vision to move beyond our current ‘throwaway society’ to a ‘zero waste economy’. The report recognises that planning will play a critical role in delivering this ambition.

<sup>26</sup> Defra (2009) Safeguarding our Soils: A strategy for England [online] available at:

<http://archive.defra.gov.uk/environment/quality/land/soil/documents/soil-strategy.pdf> (accessed 11/2012)

<sup>27</sup> Lancaster University, University of Leeds & Oxford Brookes University (2011) Understanding Walking and Cycling: Summary of Key Findings and Recommendations [online] available at: [http://www.its.leeds.ac.uk/fileadmin/user\\_upload/UWCReportSept2011.pdf](http://www.its.leeds.ac.uk/fileadmin/user_upload/UWCReportSept2011.pdf) (accessed 08/2012)

<sup>28</sup> National Institute for Health and Care Excellence (2012) Walking and cycling: local measures to promote walking and cycling as forms of travel or recreation, Public Health Guidance PH41[online] available at: <http://guidance.nice.org.uk/PH41>

- 6.11.2 Local Authority Waste Management Statistics for England - 2011/12<sup>29</sup> showed -
- 43% of household waste recycled (the highest percentage on record but the lowest annual increase in ten years)
  - 22.9 million tonnes of household waste generated equal to 431kg of waste per person (continuing the pattern of annual reductions seen since 2007/2008)
  - 10.7 million tonnes of waste collected recycled, composted or reused by local authorities (for the first time this figure was greater than the amount landfilled)

## 6.12 Water (inc. flood risk)

- 6.12.1 The National Planning Policy Framework (NPPF) states development should be directed away from areas at highest risk from flooding, and should *“not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding”*. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere.
- 6.12.2 The NPPF also states that Local Plans should also take account of the effects of climate change in the long term, taking into account factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. Planning authorities are encouraged to ‘adopt proactive strategies’ to adaptation. New developments should be planned so that they avoid increased vulnerability to climate change impacts. Where new development is at risk to such impacts, this should be managed through adaptation measures including the planning of green infrastructure.
- 6.12.3 The Flood and Water Management Act<sup>30</sup> sets out the following approaches to flood risk management:
- Incorporating greater resilience measures into the design of new buildings, and retro-fitting at risk properties (including historic buildings);
  - Utilising the environment, such as management of the land to reduce runoff and harnessing the ability of wetlands to store water; and
  - Identifying areas suitable for inundation and water storage.
- 6.12.4 The EU’s ‘*Blueprint to Safeguard Europe’s Water Resources*’<sup>31</sup> highlights the need for Member States to reduce pressure on water resources, for instance by using green infrastructure such as wetlands, floodplains and buffer strips along water courses. This would also reduce the EU’s vulnerability to floods and droughts. It also emphasises the role water efficiency can play in reducing scarcity and water stress.
- 6.12.5 The NPPF states that local authorities should produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply **Error! oomark not defined.** and should encourage and incentivise water efficiency measures at the demand side<sup>32</sup>.
- 6.12.6 [Insert discussion of River Severn Catchment Management Plan objectives etc.]

<sup>29</sup> Defra (2012) Local Authority collected waste for England [online] available at:

<http://www.defra.gov.uk/statistics/environment/waste/wrfq22-wrmswqtr/>

<sup>30</sup> Flood and Water Management Act (2010) [online] at: <http://www.legislation.gov.uk/ukpga/2010/29/contents> (accessed 08/12)

<sup>31</sup> European Commission (2012) A Blueprint to Safeguard Europe’s Water Resources [online] available at [http://ec.europa.eu/environment/water/blueprint/pdf/COM-2012-673final\\_EN\\_ACT-cov.pdf](http://ec.europa.eu/environment/water/blueprint/pdf/COM-2012-673final_EN_ACT-cov.pdf) (accessed 11/2012)

<sup>32</sup> Defra (2011) Water for life (The Water White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf> (accessed 08/2012)

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

The SA Report must include...

- The relevant aspects of the current state of the sustainability baseline and the likely evolution thereof without implementation of the plan'
- The characteristics of areas / populations etc. likely to be significantly affected.
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance

### 7.1 Introduction

7.1.1 The baseline review is about tailoring and developing the problems/issues identified through context review so that they are locally specific. A detailed understanding of the baseline can aid the identification and evaluation of 'likely significant effects' associated with the draft plan / alternatives.

7.1.2 Set out below is an update to the baseline review presented within the 2009 Scoping Report.

### 7.2 Air quality

7.2.1 There are no Air Quality Management Areas (AQMAs) in the District; or other specific air quality issues that we are aware of. Three AQMA are located in Gloucester, although these are some distance from the Stroud District boundary (which skirts Gloucester's southern fringe).

### 7.3 Biodiversity

#### The current situation

7.3.1 The District contains internationally important wildlife sites at the Severn Estuary, at Rodborough Common south of Stroud and at beech woodland straddling the north eastern boundary of the District with Tewkesbury District. There are 30 nationally important Sites of Special Scientific Interest (SSSI) in the District, covering an area of 32.57 sq km. **[Insert figures for SSSI condition and attempt to analyse common reasons for unfavourable condition]**. There is also a network of locally important 'Key Wildlife Sites' covering an area of 33.08 sq km.<sup>33</sup>

7.3.2 Ancient Woodland and Limestone Grassland habitat types are a focus of conservation effort. **[Needs reference. Potential to reference Biodiversity Action Plan or similar]**

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

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

<sup>33</sup> Stroud District Council (2010) Stroud District Annual Monitoring Report 2009/2010 [online] available at: [http://www.stroud.gov.uk/info/planning/Annual\\_Monitoring\\_Report\\_2009\\_10.pdf](http://www.stroud.gov.uk/info/planning/Annual_Monitoring_Report_2009_10.pdf) (accessed 25/03/2013)

## 7.4 Climate change mitigation

### The current situation

7.4.1 The District has a higher emission per capita than the region as a whole. Emissions from the District increased from 2005–2006 and this reflected an increase across the region. In Stroud District emissions from road transport are a major contributor to emissions, this reflects the rural nature of the District where there is likely to be a greater amount of trips by road than in urban areas. There is also an identified problem relating to commuting out of the district to access suitably paid employment. There is a high level of car ownership in the District (only 16% of households do not have a car, compared to a 20% average in the South West and a 27% average across England).

7.4.2 In terms of renewable energy, one consideration relates to that which might be generated from tidal resources. Studies have estimated the UK's total theoretical tidal range resource at between 25 and 30GWs – enough to supply around 12% of current UK electricity demand. The majority of this is in the Severn estuary (which has between 8 and 12GW).<sup>34</sup>

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

7.4.3 It seems probable that the transport sector will continue to increase its contribution to the UK total emissions of greenhouse gases. Road traffic continues to rise and there is increasing concern about the role of air travel in adding to emissions.

7.4.4 The two-year cross-government Severn tidal power feasibility study could not see a strategic case for public investment in a Severn tidal scheme in the immediate term, although private sector groups are continuing to investigate the potential.<sup>35</sup>

## 7.5 Community and wellbeing

### The current situation

7.5.1 The 2011 population estimate for the District was about 113,100.<sup>36</sup> Stroud is the largest town in the District with a population of just over 13,000. Stroud is the focus of the wider Stroud Valleys area, which also includes Nailsworth with a population of just under 6,000. Stonehouse is the district's second largest settlement with a population of just under 8,000 people. It lies 3.5 miles west of Stroud. The settlements of Cam and Dursley are situated adjacent to each other towards the south of the district, and have a combined population of around 15,000 people. Hardwicke is a village at the north of the district, on the southern edge of the Gloucester urban area. The village itself has a population of just under 4,000 people, however strategic growth is allocated here at Hunt's Grove which will increase the population by a further 1,750 households. Berkeley and Sharpness are located to the west of the District in the Severn Vale.

7.5.2 The population age structure shows that the age distribution for the District differs in certain respects from the national profile. In particular the District has a higher proportion of people in the older age groups (45 years and upwards). The District's ageing population is particularly acute in rural areas, where meeting the needs of an elderly population can be especially difficult.

7.5.3 General health appears relatively good, with about 71% of residents describing their health as 'good', compared with about 69% in the South West and England as a whole. Work undertaken by the Council in developing the Community Strategy revealed that the District's high quality natural environment influences this perception of good health.

<sup>34</sup> Wave and tidal energy: part of the UK's energy mix, DECC, 2013

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

<sup>35</sup> DECC (2013) Wave and tidal energy: part of the UK's energy mix [online] available at:

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

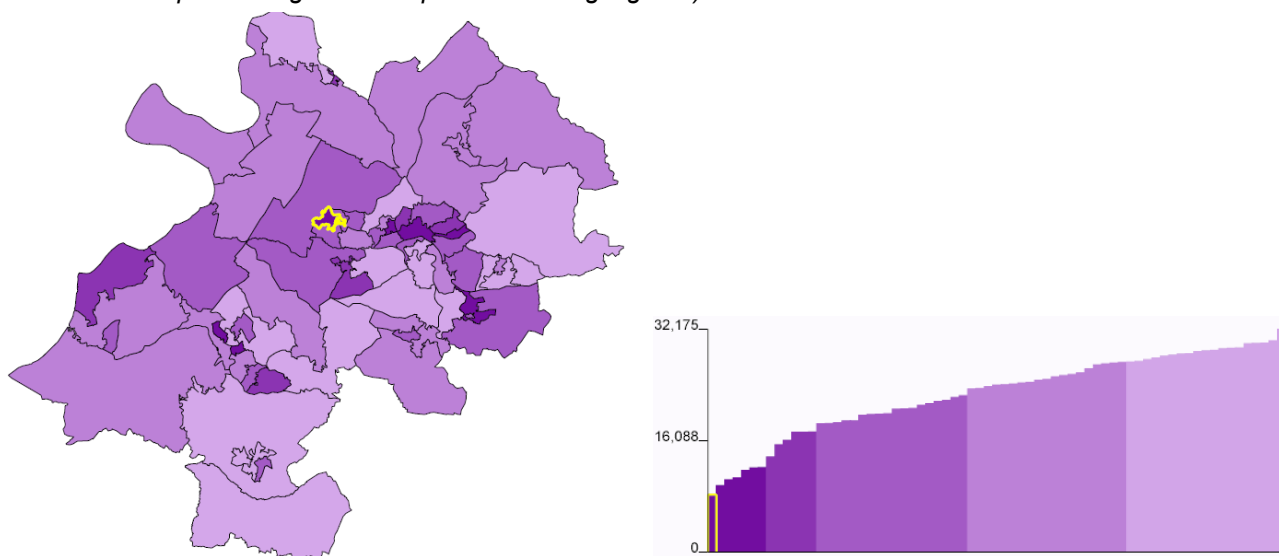
<sup>36</sup> Office for National Statistics (2011) Labour Market Profile: Stroud. Available at:

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

7.5.4 Stroud District is a relatively low crime area. The rate of offending in the District is lower than the South West or England averages in each category of crime. The crime rate per 1000 population for the District is the highest of the four other rural districts within the County, but far below that for the cities of Gloucester and Cheltenham and significantly less than the County rate. Youth crime rates (Aug 2007 to July 2008) in the Stroud District are slightly above the County rate and are the second highest in the County behind Gloucester City. A breakdown highlights that violence against the person, criminal damage and theft are the most prevalent crimes among young offenders.<sup>37</sup>

7.5.5 Stroud District is an affluent area - amongst the top 25% least deprived local authority areas of England<sup>38</sup> - but there is localised deprivation. Figure 7.1 shows 'multiple deprivation' across the District.

*Figure 7.1: Multiple Deprivation across Stroud District by Super Output Area (with worst performing / most deprived SOA highlighted)*



7.5.6 Deprivation is relatively greater in the urban areas of the District, in the Stroud Valleys, Cam and Dursley and around Sharpness Docks. Also, Berkeley is an historic market town that is 'underperforming' as witnessed a secondary school closing, the hospital relocating, and limited employment opportunities in the area. Accessibility to jobs and services is more difficult in rural areas, leading to pockets of rural deprivation.

7.5.7 In recent years regeneration efforts have been focussed at the Sharpness docks to deliver housing and employment opportunities, however the growth of Sharpness Docks with increased shipping has not progressed as planned in the previous Local Plan and regeneration has not taken place.

7.5.8 There is a need to improve the provision of facilities for young children, teenagers and young adults in the District. Children's engagement in sport and physical activity (including walking or cycling to school) is below the national average. The District's landscape presents topographic challenges to the provision of flat playing surfaces for formal sports and activities, particularly in heavily populated parts of the Stroud valleys. Suitable land is often at a premium and there are competing demands for developable housing / employment sites as well.

<sup>37</sup> Data from iQuanta reported in Stroud District Council Annual Monitoring Report (2008) available at: [www.stroud.gov.uk/info/annual\\_monitoring\\_report\\_2008.pdf](http://www.stroud.gov.uk/info/annual_monitoring_report_2008.pdf) (accessed 28/01/09)

<sup>38</sup> AECOM and BE Group (2013) Stroud District Council Employment Land Review – Final Report [online] available at: [http://www.stroud.gov.uk/info/planning/Employment\\_Land\\_Study\\_Final\\_Report.pdf](http://www.stroud.gov.uk/info/planning/Employment_Land_Study_Final_Report.pdf)



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

- 7.5.9 The number of over-65's in this District is expected to increase by over 60% by 2031. Although some over 65s may choose to or need to continue working, Stroud District will have an increasingly dependent population, with differing needs to be met. This will present a long-term challenge to local service providers – in particular in fields of primary health and social care, housing services, public transport infrastructure and community safety. There could be a need to accommodate trends in service delivery; for example, a move towards supporting elderly residents to continue to live in their own homes would act as a factor favouring a more dispersed approach to growth with affordable and key worker housing being provided throughout the District.

## 7.6 Economy and employment

### The current situation

- 7.6.1 Statistics indicate that 81% of the District's economically active population (i.e. the population that is either employed or actively seeking employment) is in employment. This is higher than the South West (73.6%) and UK average (70.5%)<sup>39</sup>.
- 7.6.2 Overall, while the District's residents are better paid than the regional average, one clear problem is that the disparity between male and female earnings is wider than in the region. Gross weekly pay for female workers in the District is only just above that for region. For male workers in the District the gross weekly pay is around £60 more than the average for the region.
- 7.6.3 Although residents are relatively well-paid, people whose workplace is located in the District are comparatively poorly remunerated. This demonstrates that the best-paid residents work outside the District and suggests that the District would benefit from inward investment from higher paying employers in the knowledge-based industries.
- 7.6.4 Despite the national picture of a structural decline in manufacturing, the Stroud District Employment Land Review (2013) reveals that this sector continues to be very important to the economy. It generates over 22% of all the jobs, more than double the regional and national averages.<sup>40</sup>
- 7.6.5 The analysis of the economy undertaken by the Stroud District Employment Land Review revealed that the economy has grown significantly in terms of service based employment with this growth being particularly driven by the expansion of business services, banking and finance services. The District has a successful tourism industry, but underperforms considering the quality of assets and the District's offer.
- 7.6.6 There is a shortfall of office and retail floor space relative to the county or South West average. There is also an issue of quality of employment stock in the District. Stroud District lacks, in particular, modern office premises with business support services and freehold small industrial sites. **[Insert further analysis from the 2013 Employment Land Study 2013 evidence around identified growth areas (south of Gloucester, M5/A38 corridor, Stroud Valleys)]**
- 7.6.7 Stroud is the principal commercial area in the district, however it is underperforming. Town centres benefit from high concentrations of historic buildings, which contributes greatly to the character and quality of the townscape; but equally, this can place restrictions on development, floorspace and capacity for change and growth.

<sup>39</sup> Office for National Statistics (2011) Labour Market Profile: Stroud [online] available at: <http://www.nomisweb.co.uk/reports/lmp/la/2038431926/report.aspx#tabrespop> (accessed 23/03/2013)

<sup>40</sup> AECOM and BE Group (2013) Stroud District Council Employment Land Review – Final Report [online] available at: [http://www.stroud.gov.uk/info/planning/Employment\\_Land\\_Study\\_Final\\_Report.pdf](http://www.stroud.gov.uk/info/planning/Employment_Land_Study_Final_Report.pdf)

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

- 7.6.8 Significant growth is occurring along the M5 corridor (focused on Gloucester, Cheltenham and Bristol) – which impacts on Stroud District now and in the future. The economic base of the District is changing from one based on manufacturing to one which is service related.

## 7.7 Housing

The current situation

- 7.7.1 In-line with population projections, at least 9,500 new homes need to be provided across the District between 2006 and 2031. Whilst a significant number of these homes are already built or committed through planning permissions, there remains a need to identify land for about 2,400 new homes.
- 7.7.2 The average house price in Stroud District in 2009 was £180,000, which is above both the southwest (£175,000) and national (£170,000) average.<sup>41</sup> There is an acute lack of affordable housing in the District. Affordable housing needs are heightened in rural areas and local home seekers find competing with socially mobile incomers difficult.
- 7.7.3 The number of dwellings built over recent years has fluctuated. Between 2006 and 2010 housing delivery in the District fell below the target (established at that time) by 115 dwellings.<sup>42</sup> The number of affordable units built each year in the District has varied year on year however completions increased overall from 2004 to 2009.
- 7.7.4 There is a need to identify pitches and plots for Gypsy, Traveller and Travelling Showpeople communities in the District, to ensure access for these communities to health services and education and to promote integrated co-existence with the settled community.

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

- 7.7.5 It looks likely that problems with affordability are likely to continue despite falling prices due to problems in getting mortgages that have arisen as a result of the economic climate. For those on the property ladder, a proportion of property owners may enter a negative equity situation.
- 7.7.6 The District's population is ageing which means that there are increasing demands for accommodation that will meet the particular needs of the elderly.

## 7.8 Landscape and cultural heritage

The current situation

*Landscape*

- 7.8.1 Much of the eastern half of the District falls into the Cotswold Area of Outstanding Natural Beauty (AONB), which covers just over 50% of the District's total land area. The western half of the District, characterised by the low lying landscape of the Severn Vale, bounded by the Severn Estuary. A landscape character assessment has also identified 19 landscape areas within the Cotswold AONB<sup>43</sup>. Another landscape character assessment identified a total of 38 landscape character types within Gloucester.

<sup>41</sup> Office for National Statistics (2009) Stroud: Key Figures for Housing [online] available at: <http://www.neighbourhood.statistics.gov.uk/dissemination/LeadKeyFigures.do?a=7&b=6275265&c=stroud&d=13&e=7&q=6427920&i=1001x1003x1004&m=0&r=1&s=1364908007016&enc=1> (accessed 02/04/2013)

<sup>42</sup> Stroud District Council (2010) Stroud District Annual Monitoring Report 2009/2010 [online] available at: [http://www.stroud.gov.uk/info/planning/Annual\\_Monitoring\\_Report\\_2009\\_10.pdf](http://www.stroud.gov.uk/info/planning/Annual_Monitoring_Report_2009_10.pdf) (accessed 25/03/2013)

<sup>43</sup> Cotswold AONB Partnership Cotswold Landscape Character Assessment [www.cotswoldsaonb.org.uk/landscape\\_character\\_assessment/introduction.htm](http://www.cotswoldsaonb.org.uk/landscape_character_assessment/introduction.htm) [accessed 28.01.09]

### *Cultural Heritage*

- 7.8.2 There are forty-two Conservation Areas in Stroud District designated by the Council for their "special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance". The Stroud Industrial Heritage Conservation Area (SIHCA) was originally designated to acknowledge and protect the influences that industry has had in forming the built environment, however, it is not exclusively made up of industrial buildings. Land within the valley bottom between Stroud, Thrupp and Brimscombe enjoys a rich heritage of industry within a high quality landscape setting. However, a number of historic mills and adjoining employment sites lie partly vacant and the river and canal remain a relatively under used recreational resource, although the Cotswold Canal Partnership is progressively delivering the restoration of the canal as a navigable waterway.
- 7.8.3 There are almost five thousand Listed Buildings in the District. Of these, 41 are the highest Grade I and 201 Grade II\* Listed Buildings. Six of these important buildings are on the 'at risk' register. Stroud District has fourteen Parks and Gardens of Special Historic Interest. The District also contains 65 Scheduled Monuments (SMs) and other sites of archaeological importance.

### *The Cotswold Canals*

- 7.8.4 The Cotswold Canals are the Stroudwater Canal and the Thames & Severn Canal. The canals corridor possesses a largely informal character. The two canals tend to bypass urban centres and the tradition of building on the towpath side ensures that the canals retain a rural or semi-rural feel, even as they pass adjacent industrial complexes. In addition to their role as recreational resource, the canal corridors represent important landscape features and have historical, architectural, nature conservation and educational value. The canals provided an historic focus for industrial activity. The Cotswold Canals Architectural Survey<sup>44</sup> identified a total of 554 individual canal features. Of these, 270 were recorded as observable features during the survey, and a further 284 sites were identified from documentary sources which no longer appear to survive above ground today.

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

- 7.8.5 The existing protection already afforded to the natural environment and built and cultural heritage within the District is likely to help preserve the District's identity; however, given development pressure there is also likely to be potential for the 'erosion' of existing and valued character qualities. Other 'drivers of change' may also have an influence to a greater or lesser extent in the future. For example, landscapes may change as a result of agricultural trends (e.g. the trend for locally sourced food).
- 7.8.6 The Council is committed to progressing the restoration of the 'Cotswold Canals'. Significant progress has already been made restoring the stretch between Stonehouse and Stroud town centre. Further works are proposed and Stroud town and Brimscombe Port are identified as crucial 'staging posts' along the route. The challenge is to make the most of the canal restoration and its regeneration potential whilst maintaining and enhancing key employment land and conserving the rural character of much of the route. There are opportunities to utilise the canal corridor to achieve wider objectives, including improving transport infrastructure, extending public access and making public realm improvements.

<sup>44</sup> Cotswold Canals Architectural Survey (2003) available at: <http://www.cotswoldcanalsproject.org/general.asp?pid=2&pgid=179>

## 7.9 Soil

### The current situation

- 7.9.1 70-80% of the Gloucestershire Cotswolds area is predominated by the Jurassic limestone, which leads to a dominance of shallow “brashy” soils. The presence of the clay shales at shallow depth may lead to situations where the limestone soils are poorly drained, and at the surface leads to wet clay soils. In agriculture, this tends to explain the pattern of arable and permanent pasture. The best most versatile agricultural land in the District is found along the north-western edge of the District. Particular concentrations are found to the north-east of Cam, to the north of Eastington and Stonehouse, and surrounding Hardwicke. A small area of such land is also found to the north of the town of Stroud.

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

- 7.9.2 It is likely that on-going redevelopment in the District will result in the continuing clean-up of contaminated land. The Council is keen to promote the reuse of previously developed land, some of which will be contaminated.

## 7.10 Transport and accessibility

### The current situation

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

- 7.10.2 The District has a relatively poor public transport system. At best, frequent bus services only run in Stroud urban area on a few main routes. Many communities have only a few services a day or, worse, only a few services a week. Use of public transport is correspondingly low, with just over 2% travel to work by train or bus. In the South West as a whole this figure is around 4%, while in nearly 10% of people in England and Wales use public transport to get to work. Many of those who commute by car commute out of the District.

- 7.10.3 Gloucestershire County Council is responsible for the management of a network of 9,662 paths. The network is comprised of 8,448 public footpaths, 815 bridleways and 399 RUPPs/restricted byways and byways open to all traffic.<sup>45</sup> Through tourism and local use, the recreational path network helps the local economy to generate income for rural businesses, while functional routes – to schools, workplaces and service facilities – form an essential part of the wider highway and amenity network. Two National Cycle Routes also pass through the District.

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

- 7.10.4 Car ownership in the UK as a whole is rising and it is likely that this is also the case in Stroud District. Given anticipated population growth in the District it seems likely that the numbers of people using the roads will rise in future. The Cotswold Canals could, once restored, will be well used for walking and cycling as well as (potentially) some transport of goods.

<sup>45</sup> Gloucestershire County Council, Rights of Way and Countryside Access Improvement Plan 2011 – 2026 [online] available at: <http://www.gloucestershire.gov.uk/CHttpHandler.ashx?id=45038&p=0> (accessed 25/03/2013)

## 7.11 Waste

### The current situation

- 7.11.1 Stroud District Council is in the top half of the league table for residual waste produced by authorities in the South West, with 529.12 kg/household. This is, however, the third lowest figure amongst Gloucestershire authorities<sup>46</sup>. In 2009/10 Stroud District had the second lowest amount of recycling in the South West with 25.77%<sup>47</sup>.

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

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

## 7.12 Water

### The current situation

- 7.12.1 The western half of the District, characterised by the low lying landscape of the Severn Vale, includes extensive areas of land liable to flooding which extend eastwards along the river corridors within the Stroud Valleys. The Stroud District SFRA published in 2012 identifies areas to be at a significant/predominantly significant risk of flooding in the flood plains of the River Frome, River Cam and within the Sharpness area. Within the Quedgeley area the flood hazard classification is considered sufficiently low that development could go ahead provided the Sequential Test is passed and due guidance followed.<sup>48</sup>

- 7.12.2 In terms of water quality of surface water bodies (of which 16 are designated), the majority (87.6%) are classified as being in a 'moderate', with 6.3% classified as 'good' and 6.3% classified as 'poor'.<sup>49</sup> In terms groundwater, much of Stroud District has been classified as a Nitrate Vulnerable Zone (NVZ), meaning that it is land that drains into nitrate polluted waters, or is close to waters that could become polluted by nitrates. NVZ are classified as such when the waters exceed or are at risk of exceeding the EU limit of 50mg/NO<sub>3</sub>/l.

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

- 7.12.3 As a result of climate change, fluvial flood risk in the District is likely to increase and there could also be increased risk of tidal flooding. In addition, more intense storm events as a result of climate change could lead to an increase in surface water flooding and flash flooding. Due to the likelihood of more droughts and water scarcity as a result of climate change water efficiency is fundamental for inclusion in future new developments in Stroud District.

<sup>46</sup> Stroud Local Environment Profiles (2011) South West Observatory [online] available at: <http://www.swenvo.org.uk/local-profiles/gloucestershire-profiles/stroud/?locale=en> (accessed 25/03/2013)

<sup>47</sup> Stroud Local Environment Profiles (2011) South West Observatory [online] available at: <http://www.swenvo.org.uk/local-profiles/gloucestershire-profiles/stroud/?locale=en> (Accessed 25/03/2013)

<sup>48</sup> SFRA (2012) Stroud District Council Strategic Flood Risk Assessment for Local Development Framework Level 2 Final Report [online] available at: [http://www.stroud.gov.uk/info/plan\\_strat/Level\\_2\\_SFRA.pdf](http://www.stroud.gov.uk/info/plan_strat/Level_2_SFRA.pdf) (Accessed 28/03/2013)

<sup>49</sup> Stroud Local Environment Profiles (2011) South West Observatory [online] available at: <http://www.swenvo.org.uk/local-profiles/gloucestershire-profiles/stroud/?locale=en> (Accessed 25/03/2013)

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

The SA Report must include...

- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance

### 8.1 Introduction

8.1.1 Drawing on the review of the sustainability context and baseline, the SA Scoping Report (2009) was able to identify a range of sustainability problems / issues that should be a particular focus of SA, ensuring it remains focused. These issues were then 'converted' into sustainability 'objectives'. These objectives provide a methodological framework for the appraisal of likely significant effects on the baseline.

### 8.2 Sustainability topics / objectives

Topics	Objectives
Air	<ul style="list-style-type: none"> <li>• Ensure that air quality continues to improve.</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>• Create, protect, enhance, restore and connect habitats, species and/or sites of biodiversity or geological interest.</li> </ul>
Climate change mitigation	<ul style="list-style-type: none"> <li>• Implement energy efficiency through building design to maximise the re-use of land and buildings, recycle building materials and use renewable sources of energy.</li> <li>• Implement strategies that help mitigate global warming and adapt to unavoidable climate change within the District.</li> </ul>
Community & wellbeing	<ul style="list-style-type: none"> <li>• Meet the challenge of a growing and ageing population.</li> <li>• Encourage social inclusion, equity, the promotion of equality and a respect for diversity.</li> <li>• Maintain and improve the community's health with accessible healthcare for residents.</li> <li>• Increase levels of physical activity, especially among the young.</li> <li>• Reduce crime and anti-social behaviour.</li> <li>• Provide access to the countryside and appropriate land for leisure and recreation use.</li> </ul>
Economy & employment	<ul style="list-style-type: none"> <li>• Support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.</li> <li>• Develop the local economy within its environmental limits.</li> <li>• Maintain and enhance employment opportunities within the District to meet both current and future needs.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Provide affordable and decent housing to meet local needs.</li> </ul>
Landscape & heritage	<ul style="list-style-type: none"> <li>• Reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of the built and cultural heritage.</li> <li>• Conserve and enhance landscapes and townscape.</li> </ul>
Soil	<ul style="list-style-type: none"> <li>• Protect and enhance soil quality.</li> </ul>
Transport & accessibility	<ul style="list-style-type: none"> <li>• Promote traffic reduction and encourage more sustainable alternative forms of transport.</li> <li>• Restore, manage and promote the canal towpaths as part of the transport infrastructure.</li> </ul>
Waste	<ul style="list-style-type: none"> <li>• Minimise the amount of waste produced, maximise the amount that is reused or recycled, and seek to recover energy from the largest proportion of the residual material.</li> </ul>
Water (inc. flood risk)	<ul style="list-style-type: none"> <li>• Maintain and enhance the quality and quantity of ground and surface waters.</li> <li>• Manage and reduce the risk of flooding in new and existing development.</li> </ul>



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

## 9 INTRODUCTION (TO PART 2)

The SA Report must include...

- An outline of the reasons for selecting the alternatives dealt with
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting preferred alternatives (and hence, by proxy, a description of how environmental objectives and considerations are reflected in the draft plan)

9.1.1 Part 2 of this SA Report is structured as follows –

- Chapter 10 - Provides an overview of plan-making / SA work undertaken between 2009 and 2012 and signposts readers to further information
- Chapter 11 - Explains in detail the '**Further consideration of the spatial strategy**' work that has been undertaken since 2012
- Chapter 12 - Explains in detail the '**Development of core and delivery policies**' work that has been undertaken since 2012

## 10 OVERVIEW OF PLAN-MAKING / SA WORK UNDERTAKEN BETWEEN 2009 AND 2012

10.1.1 Plan-making has been underway since spring **2009**, when a discussion paper was published in order to gather views on 'key issues' that might be addressed through the Local Plan (or 'Core Strategy' as it was then known). SA 'fed-in' for the first time in **2010**, when an Interim SA Report was published for consultation alongside the Council's '*Alternative Strategies for shaping the future of Stroud District*' consultation document. The Interim SA Report set out an appraisal of seven alternative broad spatial strategies with a view to informing the consultation and subsequent plan-making.

*Box 10.1: Alternative broad spatial strategies appraised in the 2010 Interim SA Report*

- **Growth Point Strategy** - 2,000 dwellings at either Cam, Eastington, Sharpness or west of Stonehouse
- **Concentrated Development Strategy** - 1,000 dwellings at two or more of the following settlements: Cam, Eastington, Sharpness, west of Stonehouse, Brimscombe or Whitminster
- **Cluster Strategy** - 200 to 250 dwellings at eight settlements, each serving a rural hinterland.
- **Stroud Valleys Strategy** - 200 dwellings in three locations and the remaining 1,400 dwellings to be located within a variety of smaller sites within the Stroud valleys.
- **Rural Combination Strategy** - 1,000 dwellings at either Cam, Eastington, Brimscombe, west of Stonehouse, Sharpness or Whitminster; and 100 dwellings to be located at a minimum of ten locations.
- **Dispersal Strategy** - 50 to 100 dwellings at least twenty five sites.
- **Rural Community Strategy** - 10 to 50 dwellings at least 40 sites.

10.1.2 The alternative broad spatial strategies were also assessed in terms of how they might perform from the point of view of CO2 emissions and renewable energy generation potential (Carbon Footprint Study, Amec 2011). The three strategies which proposed levels of concentrated growth provide the best opportunity to reduce CO2 emissions.

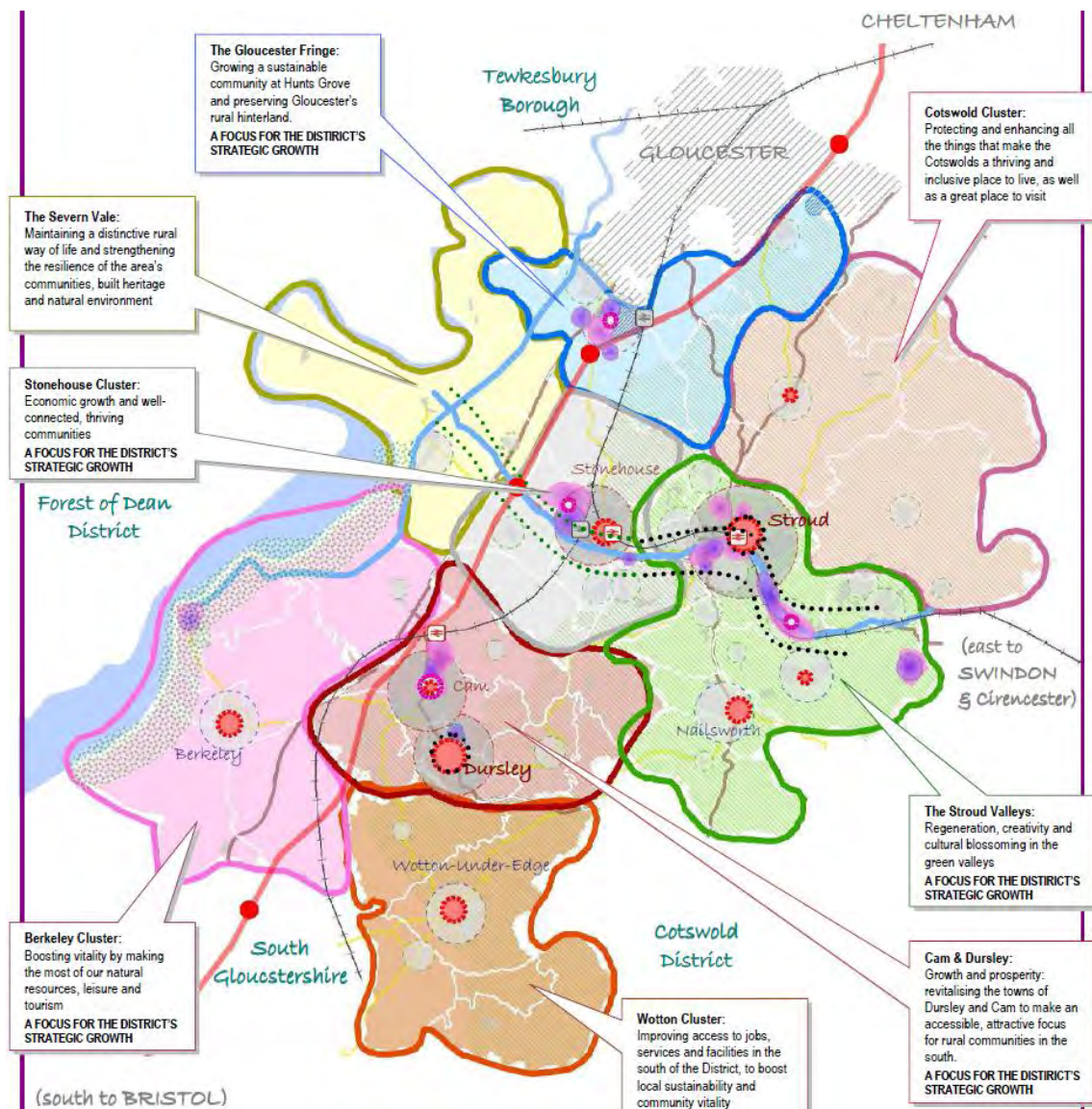
10.1.3 Subsequent to the consultation further work was undertaken to understand more about the merits of possible locations (broad locations and specific sites) for growth.<sup>50</sup> Armed with this 'bottom-up' understanding - in addition to the 'top-down' understanding achieved via consultation-on and appraisal of the seven alternative broad spatial strategies - the Council was able to publish a 'Preferred Strategy' for consultation – see **Box 10.2**. A second Interim SA Report was published alongside that presented a high-level appraisal of the preferred strategy alongside an appraisal of the seven alternative strategies.

<sup>50</sup> See the Council's 'Pros and Cons of Potential Locations for Strategic Growth' paper (October, 2011)

**Box 10.2: Overview of the preferred broad spatial strategy as it stood in February 2012**

The figure below is an extract from the 'Key Diagram' presented in the Council's February 2012 'Preferred Strategy' consultation document. The main things to note are the small pink 'blobs' that represent the strategic locations for strategic growth proposed at this time. These are located –

- On the Gloucester fringe;
- To the west of Stonehouse;
- Around Stroud and along the Stroud Valleys;
- To the north of Cam; and
- In the 'Berkley Cluster' area, specifically at Sharpness



10.1.4 **Since 2012**, further 'interim' appraisal has been undertaken in order to inform –

- Further consideration of the spatial strategy; and
- Preparation of 'Core' and 'Delivery' policies

10.1.5 **It is this post 2012 interim appraisal work that is the focus of discussion below.**

## 11 FURTHER CONSIDERATION OF THE SPATIAL STRATEGY

11.1.1 This Chapter explains –

- 1) The recent appraisal of **broad spatial strategy alternatives**
- 2) The recent appraisal of **sites allocation options**
- 3) The Council's preferred spatial strategy and how this reflects (1) and (2)

### 11.2 Appraisal of spatial strategy alternatives (2013)

#### Introduction

11.2.1 New evidence on housing need that has come to light since 2012 (i.e. since the time of the Preferred Strategy consultation) has shown that the Council must test 'higher growth quantum' options.

11.2.2 As such, this section discusses the appraisal of a range of alternative broad spatial approaches to growth that vary in terms of both growth 'quantum' and 'distribution'. Specifically, this section -

- Introduces the alternatives that were appraised with a view to explaining why these represent 'the reasonable alternatives'; and
- Presents appraisal findings.

#### Identifying 'reasonable' alternatives

11.2.3 The starting point for developing alternatives was an understanding of -

- A) The range of housing 'quantum' scenarios that must be tested in order to develop an understanding of the maximum number of homes that can be delivered sustainably (i.e. without leading to unacceptable adverse effects).
  - Housing quantum scenarios were identified through a process of **Strategic Housing Market Assessment (SHMA)** and reflect evidence of housing need (including need for affordable housing) and market demand.<sup>51</sup>
- B) An understanding of the preferred *broad* spatial strategy generated as a result of the Preferred Options consultation and work undertaken prior to this.
- C) Availability / likely deliverability of sites as established through a separate process of Strategic Housing Land Availability Assessment (SHLAA)
- D) An initial understanding of the merits of broad areas and sites, as established through consultation (2011 & 2012).

11.2.4 The alternatives that were identified in early 2013 are shown in **Table 11.1** and **Figures 11.1 – 11.5**.

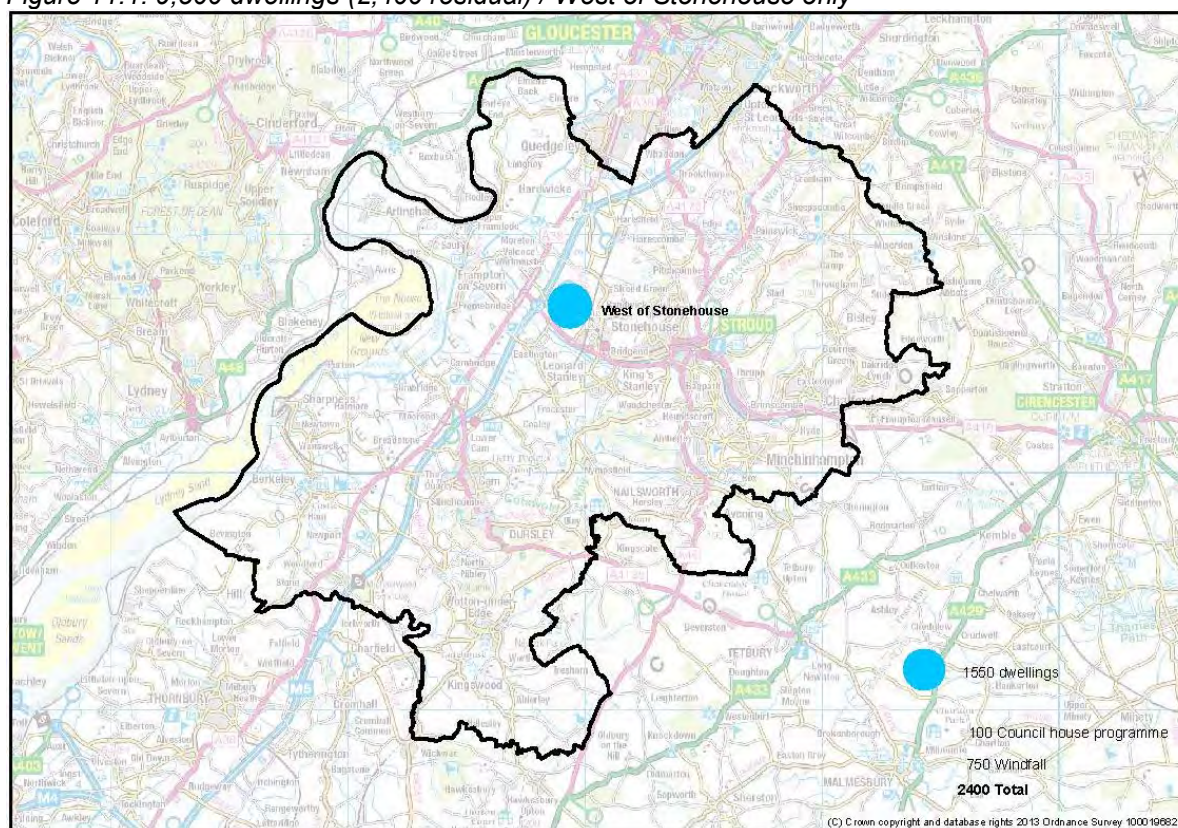
<sup>51</sup> Further background information is provided within the 'Stroud District's housing requirement to 2031' section of the Pre-submission Local Plan document (see pg 22)



Table 11.1: Broad spatial strategy alternatives 2013

	9,500 dwellings to 2031			11,500 dwellings to 2031	
	West of S'house only	No west of Stonehouse	Development at all locations	Development at all locations	West of S'house only
Residual requirement <sup>52</sup>	2400	2400	2400	4400	4400
Hunts Grove extension	-	500	500	750	-
North East Cam	-	500	500	750	-
Sharpness	-	250	250	250	-
Stroud Valleys	-	300	300	300	-
West of Stonehouse	1550	-	750	1500	3550
Council house programme	100	100	100	100	100
Windfall	750	750	-	750	750
<b>TOTAL</b>	<b>2400</b>	<b>2400</b>	<b>2400</b>	<b>4400</b>	<b>4400</b>

Figure 11.1: 9,500 dwellings (2,400 residual) / West of Stonehouse only



<sup>52</sup>Residual requirement equals the number of homes that must be delivered in the plan period minus the number of homes that are already committed, e.g. have planning permission. The residual requirement minus the number of homes that it is assumed will come forward as windfall sites minus the number of homes that will be delivered through the Council house programme equals the number of homes for which land must be allocated within the plan.



Figure 11.2: 9,500 dwellings (2,400 residual) / No west of Stonehouse

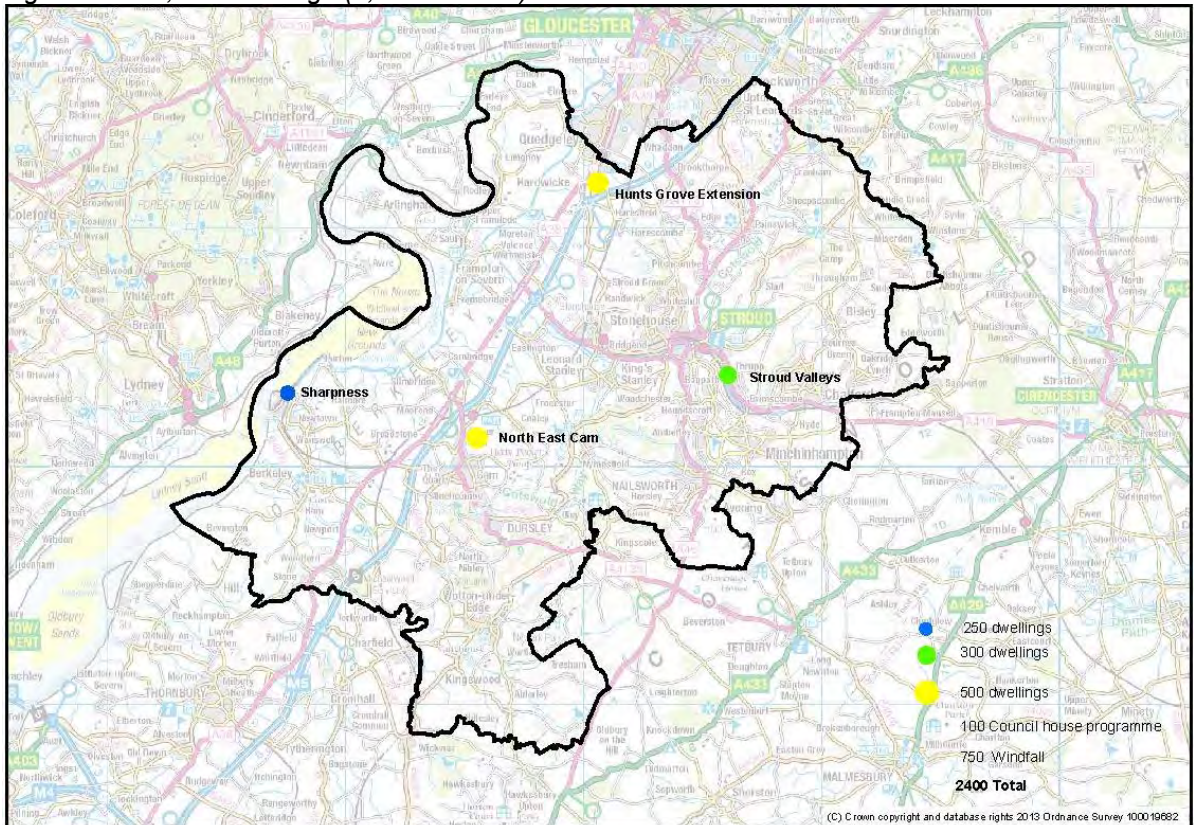


Figure 11.3: 9,500 dwellings (2,400 residual) / Development at all locations

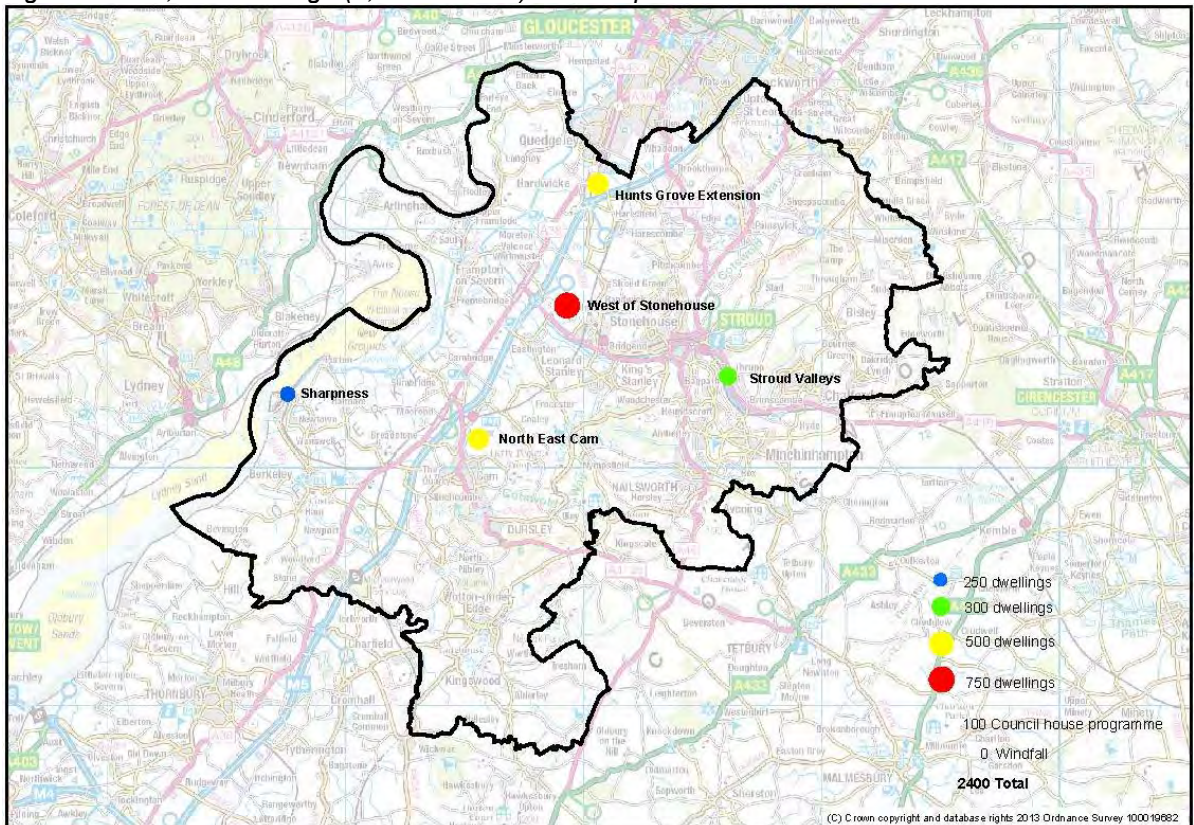




Figure 11.4: 11,500 dwellings (4,400 residual) / Development at all locations

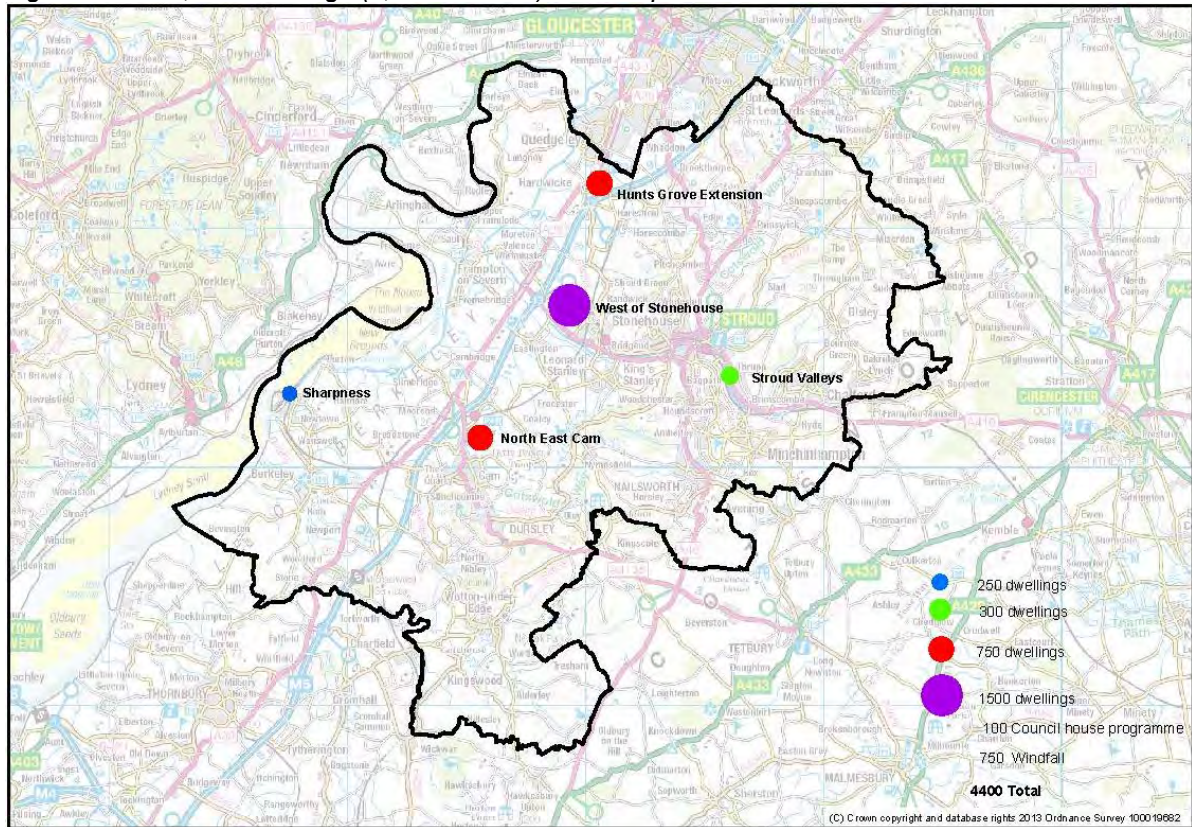
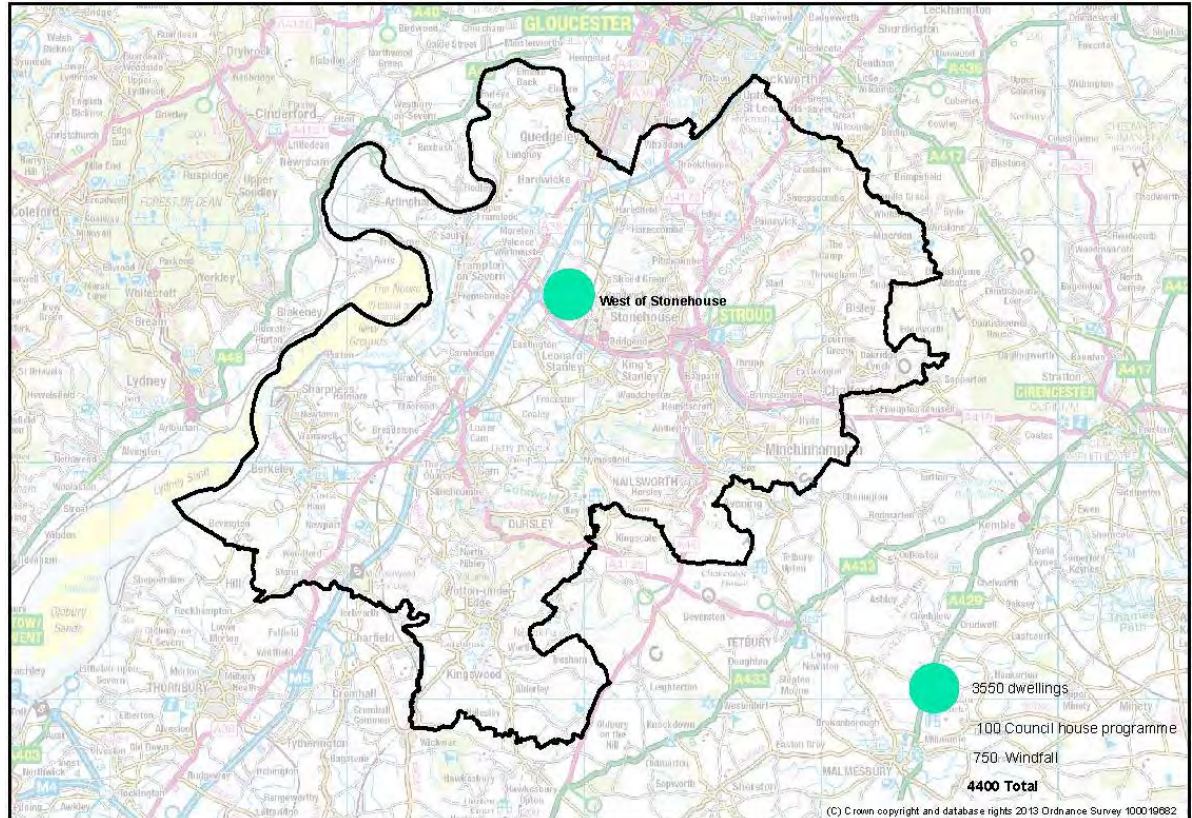


Figure 11.5: 11,500 dwellings (4,400 residual) / West of Stonehouse only



## Appraisal findings

11.2.5 **Appendix II** presents appraisal findings in detail. Table 11.2 presents a summary.

Table 11.2 Summary appraisal findings: Broad spatial strategy alternatives

Sustainability topic	Option 1 9,500 homes / West of S'house only	Option 2 9,500 homes / No west of Stonehouse	Option 3 9,500 homes / All locations	Option 4 11,500 homes / All locations	Option 5 11,500 homes / West of S'house only
Air	1	2	2	3	1
Biodiversity	1	2	2	2	1
Climate change mitigation	2	5	4	3	1
Community & wellbeing	4	2	2	1	3
Economy & employment	5	3	2	1	4
Housing	4	3	3	1	2
Landscape & heritage	1	1	1	2	2
Soil	3	1	1	2	4
Transport & accessibility	4	2	2	1	3
Waste	-	-	-	-	-
Water (inc. flood risk)	1	2	2	2	1

### Discussion

- Option 1** - is a lower growth option that would involve concentrating development at West of Stonehouse. For this reason it performs well in terms of biodiversity issues/objectives. It is suggested that Option 1 also performs well – equally well as Option 5 – in terms of climate change mitigation given the potential to design-in high quality low carbon infrastructure in the form of a district heating network.

Option 1 performs poorly in terms of socio-economic considerations given that ‘overconcentration’ would result in missed opportunities locally for housing growth to meet locally arising housing needs, support economic growth / regeneration and enhance access to community services and facilities.

Option 1 also performs poorly in terms of ‘soil’ (along with Options 4 and 5) given that housing growth would be delivered on greenfield land / no growth would be focused at brownfield land in the Stroud Valleys.
- Options 2 and 3** – are somewhat ‘middle-ground’ options, i.e. options that avoid the need to ‘trade-off’ between competing sustainability objectives (to an extent).
- Option 4** – performs well in terms of a range of socio-economic objectives on the basis that it is a higher growth option that would result in concentrated development at several locations around the district adjacent to existing settlements therefore ensuring the ‘benefits of growth’ (see discussion under Option 1) are spread across the District.
- Option 5** – performs well in terms of biodiversity and climate change mitigation (see discussion above, under Option 1); however, concentrating development at West of Stonehouse would lead to missed opportunities in terms of socio-economic considerations.



**11.3 Appraisal of housing site allocation options**

**Introduction**

11.3.1 Whilst the re-consideration of alternative broad spatial strategies described above has provided further ‘top-down’ understanding (i.e. understanding of the ‘strategic’ issues that exist and should be reflected / addressed) there is also a need to determine a preferred spatial strategy in-light of ‘bottom-up’ understanding (i.e. understanding of how sites perform as possible locations for growth in isolation, regardless of strategic issues). As such, this section discusses the merits of ‘site options’.

11.3.2 Specifically, this section –

- Lists the housing site allocation options that were appraised and explains why these were understood to represent ‘the reasonable options’; and
- Presents appraisal findings.

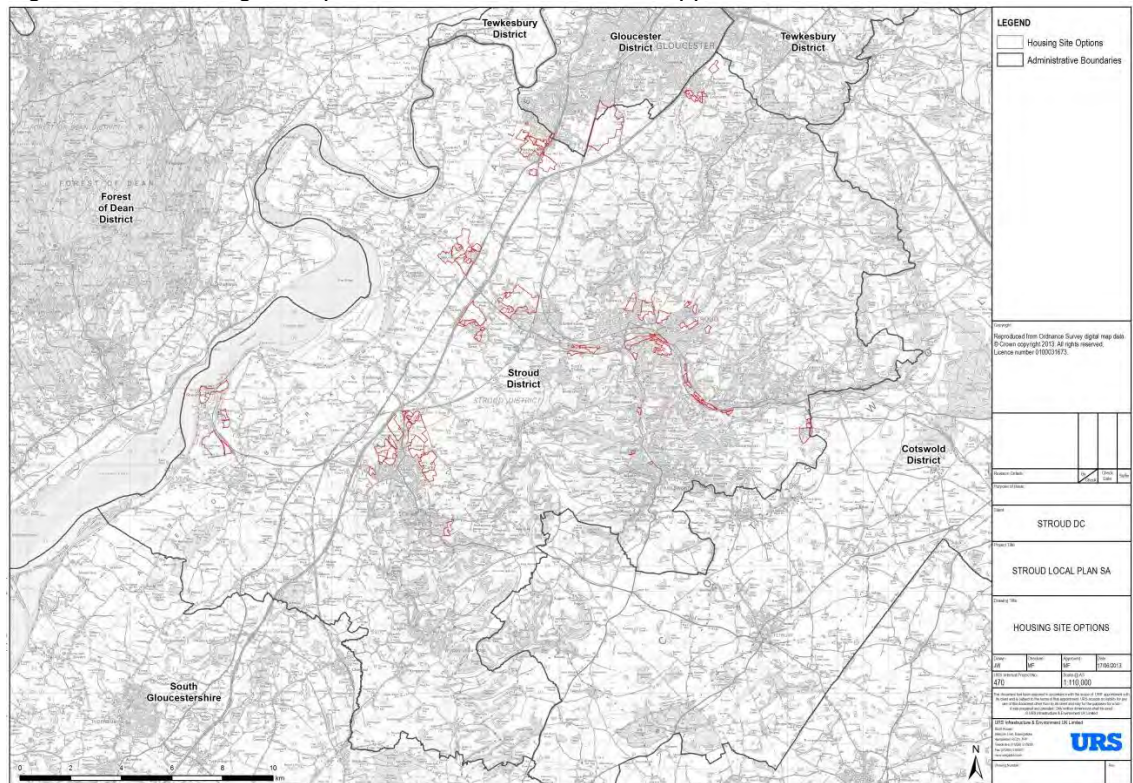
**Identifying reasonable site options**

11.3.3 Reasonable site options were identified on the basis of –

- A) Availability / likely deliverability of sites as established through a separate process of Strategic Housing Land Availability Assessment (SHLAA) and ‘Call for Sites’
- B) The preferred *broad* spatial strategy, i.e. ‘dispersed concentration’
- C) An initial understanding of the merits of broad areas and sites, as established through consultation (2011 & 2012).

11.3.4 In total, 97 site options were identified as being appropriate to consider for housing or mixed use (i.e. a mix of housing and employment uses) – see **Figure 11.6**.

*Figure 11.6: Housing site options that were the focus of appraisal*



### Appraisal findings

- 11.3.5 Each site option was subjected to SA utilising a bespoke “criteria-based” methodology (developed to be in-line with the established SA scope). For each site, performance against each of the criteria was categorised using a ‘red/green/amber’ system where: a red categorisation equates to the prediction of a ‘notable constraint’; an amber categorisation equates to the prediction of a ‘potential constraint’; and a green categorisation equates to the prediction of ‘no constraint’. **Appendix III** introduces the methodological approach in detail and presents appraisal findings.

## 11.4 Selecting a preferred spatial strategy

### Introduction

- 11.4.1 This section presents an overview of the Councils reasons for selecting the preferred approach in-light of interim appraisal findings, i.e. in-light of the ‘top-down’ evidence provided by the appraisal of broad spatial strategy alternatives and the ‘bottom-up’ evidence provided by the appraisal of housing site options.
- 11.4.2 The discussion here is somewhat high-level, but does reference particular key sites. **Appendix III** provides more detail on the specific reasons for allocating particular sites.

### Overview of reasons for selecting the preferred spatial strategy

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

## 12 DEVELOPMENT OF 'CORE' AND 'DELIVERY' POLICIES

- 12.1.1 The Council recognised a need to consult on working draft 'Core' and 'Delivery' policies prior to preparing the Pre-submission Plan. This consultation ran from March to May 2013. In order to inform the consultation and subsequent 'finalisation' of the policies, the draft policies were appraised and findings were presented in an Interim SA Report published alongside the consultation document.
- 12.1.2 **Table 12.1** presents the 'conclusions' and 'recommendations' of the Interim SA Report under 11 'topic' headings along with the Council's response / justification for selecting the preferred approach in-light of appraisal findings.

*Table 12.1: Conclusions and recommendations from the 2013 Interim SA Report, along with Council responses*

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

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



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

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

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

<ul style="list-style-type: none"> <li>ES11 (Maintaining, restoring and regenerating the District's canals) could identify and support measures to improve access to the canal for its use for transportation</li> </ul>	<p><b>Agreed.</b> Modified 1st paragraph to Delivery Policy ES11 – <i>The Council will encourage the restoration of and other necessary functional improvements to the District's canals. It will seek to improve access to and along the canals to encourage use for transport and for leisure / recreational purposes.</i></p>
<p><b>Waste</b></p>	
<p>The appraisal concluded that: <i>The policy approach should have the effect of bringing about increased levels of material efficiency in construction regardless of the level and location of growth pursued. The positive effects of the strategy could however be augmented with a greater focus on encouraging industrial efficiency in business and industry.</i></p>	
<ul style="list-style-type: none"> <li>Include considerations of industrial symbiosis when deciding upon development applications for new business and industrial premises.</li> </ul>	<p><b>Agreed.</b> Added criteria to Core Policy CP11 – <i>6. Demonstrate how the principles of industrial symbiosis have been taken into account.</i></p>
<p><b>Water</b></p>	
<p>The appraisal concluded that: <i>The policy approach should have the effect of mitigating the negative effects associated with the Development Strategy.</i></p>	
<ul style="list-style-type: none"> <li>Provide further detail, and highlighting examples of the opportunities of natural flood risk prevention measures as part of SuDS in order to strengthen the application of ES4 (Water resources, quality and flood risk).</li> </ul>	<p><b>Agreed.</b> Added supporting text to Policy ES4 (Para 6.35) – <i>The favoured approach in Stroud District to dealing with surface water is through Sustainable Drainage Systems (SuDS) as they aim to mimic natural drainage processes and remove pollutants from urban run-off at source. They comprise a wide range of techniques, including:</i></p> <ul style="list-style-type: none"> <li>• Green Roofs</li> <li>• Permeable Paving</li> <li>• Rainwater Harvesting</li> <li>• Swales</li> <li>• Detention Basins</li> <li>• Ponds</li> <li>• Wetlands</li> </ul> <p><i>This is not a comprehensive list and applicants should identify the most appropriate scheme, or combination of schemes to suit the proposed development. The multi-functional role of SuDS should be considered in developments. They can provide, alongside flood alleviation measures, green corridors and wildlife habitat creation and therefore could provide holistic solutions for development sites as part of a wider green infrastructure network.</i></p>
<ul style="list-style-type: none"> <li>Policy ES3 should be strengthened to ensure permission will not be granted to any development that would lead to increased flood risk on or off site, not simply an “unacceptable” level of risk.</li> </ul>	<p><b>Agreed.</b> Modified criterion to Delivery Policy ES3 – <i>Permission will not be granted to any development which would be likely to lead to, or result in an unacceptable level of: ..... 4. Increased risk of flooding on or off the site, and no inclusion of measures to reduce the causes and impacts of flooding.</i></p>

## **PART 3: WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?**

## 13 INTRODUCTION (TO PART 3)

The report must include...

- The likely significant effects on the environment associated with the draft plan approach
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan approach

13.1.1 The aim of Part 3 is to present appraisal findings and recommendations in relation to the Pre-submission Plan. Part 3 is structured as follows:

- Chapter 14 presents an appraisal of the plan under 11 ‘sustainability topic’ headings
- Chapter 15 discusses overall conclusions at this current stage
- Chapter 16 summarises recommendations.

## 14 APPRAISAL OF THE DRAFT PLAN

### 14.1 Methodology

14.1.1 The appraisal is structured under 11 ‘sustainability topic’ headings. For each topic a range of sustainability objectives are listed. Taken together, the sustainability topics and objectives provide a methodological ‘framework’ for the appraisal of likely significant effects on the baseline.

14.1.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained in full.<sup>53</sup> In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

14.1.3 It is important to note that effects are predicted taking into account the criteria presented within Schedule 2 of the SEA Regulations.<sup>54</sup> So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered (i.e. where the effects of the plan may combine with the effects of other planned or on-going activity that is outside the control of the Stroud Local Plan). These effect ‘characteristics’ are described within the appraisal as appropriate.

#### Added structure

14.1.4 Although there is a need to focus on the effects of ‘the plan’ as a whole, it is helpful to break up the appraisal with sub-headings. Four sub-headings are used under each ‘topic’ heading:

- 1) Appraisal of CP2 (Strategic locations) and the ‘Strategic Allocation’ (SA) policies
- 2) Appraisal of the ‘Core’ (CP) policies
- 3) Appraisal of the ‘Delivery’ (HC, EI and ES) policies
- 4) Appraisal of the Plan as a whole

14.1.5 Also, under sub-headings (2) and (3) a box is included which lists those policies that are a focus of the subsequent discussion.

<sup>53</sup> As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

*“Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification.”*

<sup>54</sup> Environmental Assessment of Plans and Programmes Regulations 2004



**14.2 Air**

Relevant sustainability objectives

- To ensure that air quality continues to improve.

Appraisal of CP2 (Strategic locations) and the ‘Strategic Allocation’ (SA) policies

14.2.1 It is not likely that the spatial strategy will result in air quality problems given that the baseline situation is good. Gloucester does have some localised problems; however, it is not expected that the 500 home Hunts Grove Extension on the Gloucester fringe will exacerbate this or act as a barrier to improving air quality in Gloucester.

14.2.2 It is assumed that growth can be delivered in a concentrated fashion at each of the strategic growth locations without resulting leading to traffic congestion / the worsening of air quality locally to the extent where it becomes a problem (see discussion below, under ‘Transport and accessibility’).

Appraisal of the ‘Core’ (CP) policies

Relevant policies:

- **CP8** (New housing development); **CP11** (New employment development); **CP13** (Demand management and sustainable travel measures); **CP14** (High quality sustainable development)

14.2.3 All of these policies offer support to public transport, walking and cycling. See discussion under the ‘Transport and accessibility’ topic heading, below.

Appraisal of the ‘Delivery’ (HC, EI and ES) policies

Relevant policies:

- **HC4** (Local housing need: exception sites);
- **EI6** (Protecting individual and village shops, public houses and other community uses); **EI12** (Promoting transport choice and accessibility); **EI13** (Protecting and extending our cycle routes);
- **ES5** (Air Quality).

14.2.4 The approach set out in Policy **ES5** establishes that any development proposals likely to exacerbate existing areas of poor air quality must demonstrate that measures can be taken to effectively mitigate emission levels. This should help to ensure that the District’s air quality (and air quality within neighbouring districts) does not deteriorate in light of new development to the point where it becomes a problem to human health (or the natural environment).

14.2.5 Other policies offer support to public transport, walking and cycling and seek to ensure development in accessible locations (e.g. near to community facilities) with a view to reducing the need to drive short journeys. See discussion under the ‘Transport and accessibility’.

Appraisal of the Pre-submission Plan ‘as a whole’

14.2.6 **Significant negative effects** on the air quality baseline are **unlikely** given that baseline conditions are currently non-problematic. It is inevitably the case that growth at the scale proposed could have some localised impacts in terms of traffic congestion; however, in general the spatial strategy (dispersed concentration with a focus on areas where there is the potential for public transport and walking/cycling infrastructure improvements) will mitigate this as will the policy measures that will be put in place.

Allocation of the ‘reserve site’ at **West of Stonehouse** would result a significant concentration of growth; however, this is unlikely to result in air quality problems locally. It is understood that West of Stonehouse

does lend itself to 'encouraging walking and cycling' (see discussion under 'Transport and accessibility').

### 14.3 Biodiversity

#### Relevant sustainability objectives

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

#### Appraisal of CP2 (Strategic locations) and the 'Strategic Allocation' (SA) policies

- 14.3.1 New development in the District could impact upon biodiversity both directly (e.g. through loss of habitat) and indirectly (e.g. through pollution). However, it is likely that the preferred approach to strategic growth and development locations will help to ensure that effects are avoided or minimised. This conclusion is reached on the basis that development will be concentrated at a relatively small number of locations all of which are understood to be relatively unconstrained in terms of strategic biodiversity considerations.
- 14.3.2 Growth at Sharpness is a key consideration given the internationally important habitats / species assemblages associated with the Severn Estuary. The potential for significant effects (taking into account mitigatory policy within the plan) has been considered through a separate process Habitats Regulations Assessment (HRA), which considered the potential for negative effects 'through' recreation, air quality, disturbance (other than recreation) and water supply / waste water treatment. The potential for 'cumulative effects' as a result of the plan acting in combination with other plans and programmes was also considered. The HRA has been able to conclude that significant effects are not likely.
- 14.3.3 The other internationally important site that has been a focus of HRA is Rodborough Common to the West of Thrup / Brimscombe (i.e. 'the Stroud Valleys'). Three allocated sites are within 500m (the nearest being 289m distant), but again HRA (which focused on effects 'through' air quality and recreational pressure) is able to conclude that significant effects are not likely given the sensitivity of the site and the policy measures that will be put in place through the plan.
- 14.3.4 Growth at North East Cam is another consideration given that this location - adjacent to the River Cam - is potentially somewhat sensitive. However, it is recognised that there is the potential to 'design-in' green infrastructure with a view to maintaining (or even enhancing) the role of the river as an ecological 'corridor' and also ensuring that residents benefit from good 'access to nature'.
- 14.3.5 In terms of locally important wildlife sites (known as 'Key Wildlife Sites')<sup>55</sup> the preferred spatial strategy does avoid these, which is to be commended (given that a number of the rejected site options do overlap with a KWS). The allocated site at Cheapside in the Stroud Valleys is located 15m from a KWS associated with the canal corridor.

#### Appraisal of the 'Core' (CP) policies

Relevant policies:

- **CP6** (Developer Contributions and Infrastructure); **CP8** (New housing development); **CP11** (New employment development); **CP14** (High quality sustainable development)

- 14.3.6 The prioritisation of brownfield sites is promoted through **Policy CP14**, which should help to relieve development pressure on greenfield, biodiversity rich sites (although it should be noted that brownfield sites can also have significant biodiversity value).

<sup>55</sup> More information is available @ <http://www.gloucestershirewildlifetrust.co.uk/what-we-do/local-nature-conservation/conservation-areas/key-wildlife-sites>

14.3.7 The importance of delivering and enhancing green infrastructure is made apparent through references in Policy **CP8** (“Major residential development proposals will be expected to enhance biodiversity through a network of multi-functional green spaces, which support the natural and ecological processes”) and Policy **CP11** (“Enable provision of infrastructure in ways consistent with cutting carbon dioxide emissions and adapting to changes in climate (including SuDS and green infrastructure”). Green Infrastructure is also covered by supporting text such as at **CP6** (Developer Contributions and Infrastructure).

14.3.8 Policy **CP14** sets requirements that should lead to indirect benefits to biodiversity: “No unacceptable levels of air, noise, water, light or soil pollution or exposure to unacceptable risk from existing or potential sources of pollution. Improvements to soil and water quality will be sought through the remediation of land contamination, the provision of SuDS and the inclusion of measures to help waterbodies to meet good ecological status... [and] Re-use of previously developed land and/or the adaptation of existing buildings that make a positive contribution to the character of the site and surroundings, unless demonstrably unviable.”

#### Appraisal of the ‘Delivery’ (HC, EI and ES) policies

Relevant policies:

- **HC1** (Meeting small-scale housing need within defined settlements)
- **EI4** (Development on existing employment sites in the countryside); **EI10** (Provision of new tourism opportunities); **EI11** (Promoting sport, leisure and recreation)
- **ES2** (Renewable or low carbon energy generation); **ES6** (Providing for biodiversity and geodiversity); **ES8** (Trees, hedgerows and woodlands); **ES11** (Maintaining, restoring and regenerating the District’s canals); **ES12** (Better design of places); **ES14** (Provision of semi-natural and natural greenspace with new residential development)

14.3.9 The approach set out in **Policy ES6** notes that: “development is not to lead to adverse effects on international sites, whether alone or in combination; that other designated sites will be protected unless the benefits of new development outweigh nature conservation or scientific interest; and that new development is to conserve and enhance the natural environment, including all sites of ecological or geological value, with legally protected species to be safeguarded”. These measures should help to ensure that positive effects are achieved against the baseline, although new development could still result in a loss in biodiversity at the District-scale by the end of the plan period (given the assumption that biodiversity considerations will not always be a priority). The statement that “The Council may, in exceptional circumstances, allow for biodiversity offsets, to prevent net loss of biodiversity at the District scale” should help to ensure negative effects are avoided or mitigated.

14.3.10 Also, the following policy measures will have positive implications:

- Policy **HC1** requires that small-scale housing within defined settlements does not result in the loss of locally valued habitat which supports wildlife.
- Policy **EI4** requires that proposals for the extension of buildings on existing employment sites in the countryside should include measures to secure environmental improvements.
- Policy **EI10** calls for towards tourism proposals to carefully consider the protection of environmentally sensitive sites and not detract from any acknowledged biodiversity interest.
- Policy **EI11** – requires that “Any biodiversity interest is enhanced by taking opportunities to create a network of multi-functional green spaces, which support the locality’s natural and ecological processes.” This could have notable implications given that leisure and sports facilities may include considerable amounts of green space (e.g. golf courses).
- Policy **ES2** recognises that renewable and low carbon schemes can impact biodiversity.
- Policy **ES8** looks to ensure that development does not adversely affect protected trees, hedgerows and woodlands and so is likely to result in positive effects on biodiversity.

- Policy **ES11** establishes that canal development should reflect the local biodiversity interest.

- 14.3.11 Policy **ES14** requires that greenspace includes biodiversity interest. The supporting text includes reference to the importance of providing “ecosystem services (e.g. urban cooling and shading, flood water retention, carbon storage, climate change alleviation) and should provide a real increase in the quality of life for those living nearby.”
- 14.3.12 Also, Policy **ES12** – should result in indirect benefits given the statement that: “The District Council will require the layout and design of new development to create well designed, socially integrated, high quality successful places, where people enjoy living and working, with legible and well planned routes, blocks and spaces, integrated residential, commercial and community activity, safe attractive public spaces and pedestrian/cycle routes without traffic conflict, secure private areas, better designed buildings and landscaped spaces.”

Appraisal of the Pre-submission Plan ‘as a whole’

- 14.3.13 In-light of the findings of Habitats Regulations Assessment (HRA) it is possible to conclude that **significant negative effects** on biodiversity are **unlikely**. The HRA focused on impacts to the internationally important sites at Rodborough Common, along the Severn Estuary and at the Cotswold Beechwoods SAC (which is located on the edge of the District away from areas that are a focus of growth). Through this SA it has also been possible to examine the potential for effects to national important sites (i.e. Sites of Special Scientific Interest that are not also designated as being of international importance) and locally important sites (i.e. Key Wildlife Sites). Effects are unlikely on the basis that allocated sites are generally some distance away; nor is there reason to believe that sites in-combination will lead to an impact on any biodiversity site.
- 14.3.14 It is also important to consider ‘biodiversity in the wider landscape’ and the potential for the wider landscape to support ‘connectivity’ between key sites. In this respect the plan performs well on basis that it sets clear requirements for the maintenance and enhancement of ‘green infrastructure’. If it is the case that delivery of green infrastructure is well managed - i.e. delivered in a targeted fashion in-line with strategic objectives – it may be that there can be a significant positive effect on biodiversity at the District-scale in the long-term as a result of the Plan.
- 14.3.15 The importance of maintaining and enhancing the provision of ‘ecosystem services’ is referenced in relation to open space; however, the concept of ecosystem services is not set to have a prominent role as a metric when determining planning applications. This is understandable given that the concept is an ‘emerging one’.

Allocation of the ‘reserve site’ at **West of Stonehouse** would result in would result in this area being the focus of a major concentration of growth. The site itself is unconstrained in terms of strategic biodiversity considerations, although it does border an extensive locally important wildlife site (associated with the canal corridor). This is not thought to be a major concern (given that the important habit is located on the opposite side of the canal).

A major development of this scale should lead to the potential to ‘design-in’ green infrastructure, ensuring that the development is ‘permeable’ to species movement and newly created habitats support the functioning of the district-wide ecological network.

## 14.4 Climate change mitigation

### Relevant sustainability objectives

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

### Appraisal of CP2 (Strategic locations) and the 'Strategic Allocation' (SA) policies

- 14.4.1 A key means by which the plan can contribute to climate change 'mitigation' is through locating development with a view to reducing car dependency / encouraging low carbon modes of travel. The performance of the plan in this respect is discussed under the 'Transport and accessibility' heading, below. The focus of discussion here is the potential to contribute to climate change mitigation through supporting delivery of renewable / low carbon infrastructure - and in particular 'district heating schemes' - as part of new development.
- 14.4.2 The 'concentrated development' approach promoted through the plan should lead to good potential for delivering district heating schemes. Specifically 500 home developments at Hunts Grove and North East Cam should have the potential to support an optimal scheme i.e. one that is powered by biomass fuelled combined heat and power (CHP).<sup>56</sup> Focusing 250 homes at Sharpness and 300 homes at Stroud Valleys could also afford the opportunity for an optimal district heating scheme given that homes at both locations will be brought forward as part of mixed-use developments; and given that employment uses can support delivery of a viable district heating scheme.<sup>57</sup>
- 14.4.3 Another key consideration is, of course, climate change adaptation. The plan can also ensure that communities within the District are resilient to the effects of future climate change. This is a matter that is considered under other topic headings. In particular, issues relating to flood risk are considered under the 'Water' heading, below).

### Appraisal of the 'Core' (CP) policies

#### Relevant policies:

- **CP3** (Settlement hierarchy); **CP4** (Place making); **CP5** (Environmental development principles for strategic sites); **CP8** (New housing development); **CP11** (New employment development); **CP14** (High quality sustainable development)

- 14.4.4 Policies **CP3**, **CP4** and **CP5** seek to focus and capitalise on opportunities to encourage development in areas with existing public transport infrastructure – see further discussion below, under Transport and accessibility.
- 14.4.5 Policy **CP5** (strategic sites) and **CP8** (new housing development) both include specific requirements that development must minimise energy consumption and incorporate sustainable construction techniques. Both policies identify the need for on-site low or zero carbon energy generation and are thus likely to have positive effects.
- 14.4.6 Policies **CP11** and **CP14** are also likely to have a positive effect on addressing the identified climate issues, however, to a lesser extent than policies detailed above. Policy CP14 promotes "*Sustainable construction techniques, including facilities for the recycling of water and waste, measures to minimise energy use and maximise renewable energy production.*"

<sup>56</sup> It is assumed – on the basis of the Stroud Carbon Footprinting Study (AMEC, 2011) that there is a 500 home threshold level at which it becomes possible to deliver a district heating scheme powered by biomass fuelled combined heat and power (CHP). This is on the basis that biomass fuelled CHP give rise to a need space requirements for fuel storage and delivery.

<sup>57</sup> A housing scheme of this size 'on its own' would normally only lead to the potential for 'less optimal' scheme, i.e. one that is

Appraisal of the 'Delivery' (HC, EI and ES) policies

Relevant policies:

- **EI12** (Promoting transport choice and accessibility)
- **ES1** (Sustainable construction and energy efficiency); **ES2** (Renewable or low carbon energy generation)

14.4.7 Policies **ES1** and **ES2** focus on encouraging sustainable construction techniques and renewable energy generation. Policy ES2's particular recognition that renewable or low carbon sources should be considered in light of their need for "effective operation" is good; however due to the policy's strong protective wording for landscape character and visual amenity etc. the likelihood of significant positive effects is tempered somewhat. The policy's indication that renewable and low carbon development can only have adverse impacts and the requirement for "rigorous assessment" of wind developments could possibly discourage applications and stymie significant development opportunities. Having said this, it is noted that the supporting text highlights that: *"Such development can have positive effects upon local communities, as well as natural resource use and building resilience to future climate change. For example, photovoltaic arrays at the Dursley swimming pool and at Cam - Winterbottom Memorial community hall; that all generate an income source for those facilities."*

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14.4.8 The discussion under this heading has focused on the degree to which the plan supports the delivery of low carbon energy infrastructure (in particular, district heating networks) and sustainable construction (i.e. buildings built to high standards of the 'Code for Sustainable Homes' or similar). With regards to the former, the concentrated growth strategy should mean that it is possible to design-in district heating schemes; however, there can be little confidence that this will actually happen in practice (given viability considerations). With regards to the latter, it seems that the plan is set to establish an appropriate policy approach, albeit one that recognises that landscape/townscape/community considerations can sometimes be used as a reason to block measures that might be optimal from a purely climate change mitigation perspective.

14.4.9 Overall, the positive measures described under this heading are not sufficient to warrant a 'significant positive effects' conclusion. This is particularly the case given the nature of the 'climate change mitigation baseline' – i.e. it is a global problem – and the fact that an overriding climate change mitigation consideration relates to the degree to which the Plan will support reduced car dependency / car travel (a matter that is discussed further below).

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

Allocation of the 'reserve site' at **West of Stonehouse** would result in this area being the focus of a major concentration of growth and, as such, there will be good potential to design-in an optimal district heating scheme.



## 14.5 Community and wellbeing

### Relevant sustainability objectives

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

### Appraisal of CP2 (Strategic locations) and the 'Strategic Allocation' (SA) policies

- 14.5.1 The preferred approach is based on a 'dispersed concentration' strategy whereby growth is focused at a small number of locations within or adjacent to larger settlements. This approach will result in new communities located: A) where there is relatively good existing access to services and facilities; and B) where there is the potential to bring forward new services/facilities (e.g. new schools, GP surgeries and leisure provision) that require a 'critical mass' of people within a given area to be viable. There will be the potential for benefits to be realised by residents of existing settlements as well as residents of new developments. Ensuring good access to health services is particularly important given an ageing population.
- 14.5.2 The 'dispersed' nature of the strategy means that the 'benefits of growth' will be felt by existing residents across the District. For example, opportunities to increase access to services facilities for residents of the rural area surrounding Cam/Dursley will be realised and there will be support for efforts to bring about regeneration at Stroud, Dursley, Sharpness Docks and along the Cotswold canals corridor. In the Stroud Valleys there is the potential for development to support and enhance the geographical and functional distinctness of Stroud's major 'suburbs', enhancing their self-sufficiency as communities in their own right (whilst also improving accessibility and linkages with the town). Furthermore, the canals provide a network of footpaths for outdoor recreation that would be readily accessible from the new developments. As such, there will be increased opportunities for physical activity.
- 14.5.3 Having said that the preferred 'dispersed concentration' approach is appropriate, it is noted that further growth could potentially be accommodated at Hunts Grove and at North East Cam. Also, it is noted that West of Stonehouse - where there is the potential to accommodate a large new development - is included in the plan as a 'reserve site' (and hence we assume will not be allocated). As such, it is not clear that the preferred quantum of growth maximises benefits in terms of community and well-being considerations.
- 14.5.4 Finally, it is worth directing readers to the appraisal of site options in Appendix III of this report, where it is identified that:
- A number of the proposed allocation are some distance (measured according to bus travel time) from existing services and facilities. In these cases it will be important that the Council works with developers to ensure that community infrastructure is brought forward as part of development, or financial contributions are collected that go towards provision.
  - Relatively few of the proposed allocations are directed to parts of the District that are 'relatively deprived' (as measured by the Index of Multiple Deprivation). This is not necessarily surprising given the assumption that more deprived neighbourhoods tend to be in urban areas where there is little potential for large scale development.

### Appraisal of the 'Core' (CP) policies

#### Relevant policies:

- **CP7** (Lifetime communities); **CP9** (Affordable housing); **CP10** (Gypsy, Traveller and Travelling Showpeople sites); **CP13** (Demand management and sustainable travel measures); **CP14** (High quality sustainable development)

- 14.5.5 Policy **CP7** seeks to ensure that all major development (over 10 dwellings or more, plus community facilities) will be required take into account the needs of an ageing population in terms of design, accessibility, and services. In addition, Policy CSP7 calls for the needs of minorities, those with children, young people and families, and those with disabilities to be taken into account in development proposals. This focus on meeting the long term identified needs of those in the District should help to ensure that positive effects are achieved over the plan period.
- 14.5.6 Policies **CP9** and **CP10** address particular housing needs. Meeting identified needs in terms of housing has important implications for communities and well-being. This matter is discussed further below, under 'Housing'.
- 14.5.7 Another matter relates to encouraging active lifestyles, e.g. through encouraging active travel and ensuring good access to sports facilities. The support offered to walking and cycling through a number of the plan policies is likely to bring about positive effects. In particular, Policy **CP13** will ensure that planning permission is granted to those schemes that result in improvements to the existing infrastructure network, including facilities for pedestrians and cyclists. This is discussed further below, under 'Transport and accessibility'.
- 14.5.8 Stroud District is considered to be a relatively low crime area in comparison to South West or England averages; however, some issues do exist e.g. in relation to youth crime. In terms of crime, Policy **CP14** calls for new developments to feature designs and layouts that assist crime prevention and community safety and so should result in positive effects.

### Appraisal of the 'Delivery' (HC, EI and ES) policies

#### Relevant policies:

- **HC1** (Meeting small-scale housing need within defined settlements); **HC4** (Local housing need: exception sites); **HC7** (Annexes for dependents or carers)
- **EI6** (Protecting individual and village shops, public houses and other community uses); **EI11** (Promoting sport, leisure and recreation); **EI12** (Promoting transport choice and accessibility); **EI13** (Protecting and extending our cycle routes)
- **ES12** (Better design of places); **ES13** (Protection of existing open space); **ES14** (Provision of semi-natural and natural greenspace with new residential development); **ES15** (Provision of outdoor play space)

- 14.5.9 Positive effects may occur as a result of **Policy ES12**; this calls for new development to be designed to offer flexibility for future needs (so taking into account demographic and other changes) and for socially integrated development which supports community activity.

14.5.10 Health and wellbeing related benefits are likely to occur through new sports, cultural, leisure and recreational facilities, the delivery of which is supported through **Policy EI11**. This policy approach also looks to ensure that such facilities have adequate cycling and walking links and are accessible to those who are disabled, and so should be capable of ensuring benefits for all. In relation to recreation and leisure, **Policy ES13** should also result in positive effects as it will ensure that development proposals do not lead to the whole or partial loss of open spaces without an assessment of the current level of provision, and the creation of a suitable replacement facility where necessary. This latter policy is supported by **Policy ES14** which looks to ensure that residential developments are accompanied by accessible greenspace and by **Policy ES15** which calls for development to provide appropriate public outdoor play space.

14.5.11 Also, the following policy measures will have positive implications:

- Policy **HC1** seeks to ensure that appropriate levels of private amenity space are provided in residential developments (or redevelopments) within defined settlements.
- Policy **HC7** supports the creation of annexes on existing properties outside defined settlements where there is a clear requirement for such development to meet the needs dependents or carers.
- Policy **EI6** looks to ensure that community uses are only lost where there is no prospect of continued community use or viability, or where there are adequate similar facilities within easy reach.
- Policy **ES12** focuses on new and better design of places and aims to ensure that new development is designed to offer flexibility for future needs and uses, stating that: *“New development should be designed to offer flexibility for future needs and uses taking into account demographic and other changes.”* The extent to which this policy will ensure new development will be resilient to the impacts of future climate change is unclear.
- Policy **ES14** requires that *“No person should live more than 300m (or 5 minutes walk) from their nearest area of natural green space of at least 2 hectares in size.”*

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14.5.12 The dispersed concentration strategy will mean that high quality new developments come forward and existing residents also experience the benefits of growth (e.g. as a result of improved access to community infrastructure); and hence the plan will result in a situation ‘better than the baseline’. However, a higher growth approach is feasible and would likely result in greater benefits, potentially leading to particular community and wellbeing needs being addressed / particular opportunities being realised. The approach to core and delivery policies is appropriate and will go some way to ensuring that the needs of communities and particular groups within the population are recognised and addressed.

Allocation of the ‘reserve site’ at **West of Stonehouse** would result in this area being the focus of a major concentration of growth. Development concentrated in this way could result in funding been made available for new services and facilities to the benefit of new and existing residents locally; and – more generally - it can be suggested that there would be a good opportunity for self-containment and the building of a cohesive, inclusive community.

## 14.6 Economy and employment

### Relevant sustainability objectives

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

### Appraisal of CP2 (Strategic locations) and the 'Strategic Allocation' (SA) policies

14.6.1 The preferred approach to strategic growth and development is one that targets housing growth to locations where there is the opportunity to 'unlock' / enable employment growth and regeneration:

- Housing and employment growth directed to Hunts Grove (near to the Hardwicke employment hub) and North East Cam reflect the fact that demand for employment land within Stroud District is driven by demand for land close to the M5.
- Similarly, employment growth is allocated at Stonehouse (home to a major industrial and business area, which provides jobs for over 4,000 and has seen recent construction of office units); however, it is noted that the opportunity to further capitalise on employment growth at West of Stonehouse will be missed unless a higher growth quantum strategy is followed at the 'reserve site' at West of Stonehouse is allocated.
- Cam / Dursley is an area where there is an identified need to 'intervene' with a view to stimulating a structural shift towards employment in higher technology and light industrial activities and employ. Employment growth has been planned in the past (through the current Local Plan) but has not come forward in part as a result of infrastructure constraints. Targeted housing growth has the potential to address this constraint.
- Targeting housing growth to the Stroud Valleys and at Sharpness Docks has the potential to stimulate the intensification of underused employment resources and in turn support wider regeneration efforts.

14.6.2 Other considerations relate to

- The need to co-locate housing growth and employment growth with a view to ensuring a suitably skilled local workforce. Residents of Stroud District are better-paid than the regional average, however a large number (and the best paid) work outside of the District.
- The need to support thriving town centres so that these can continue to perform a role as centres of economic activity (as well as a role as 'community hubs'). It is particularly important to consider the degree of support that is given to Stroud (a town centre that struggles to maintain its retail role given competition from nearby larger towns) and Cam/Dursley (which serves an extensive rural hinterland). In terms of Stroud Town Centre the proposal to direct growth to the Stroud Valleys should lead to benefits given the potential for mixed-use development here to bring about public realm enhancements, improved linkages and a boost to town centre trade.
- The need to ensure that growth in one location does not undermine the role and function of other locations, through adhering to the settlement and retail hierarchies. In this respect the preferred spatial strategy does not give rise to any obvious concerns.

### Appraisal of the 'Core' (CP) policies

#### Relevant policies:

- **CP11** (New employment development); **CP12** (Town centres and retailing)

14.6.3 Policy **CP11** seeks to address the decline in manufacturing and to capitalise on the growth experienced locally in creative and service industries. The policy enables the reuse, refurbishment and development of sites which could encourage new businesses to the area whilst intensifying the number of jobs on employment sites.

14.6.4 In terms of town centres and retailing, Policy **CP12** seeks to maintain and enhance existing provision and provide an appropriate range of facilities and services; provide opportunities for commercial development including retail and leisure; improve and enhance vitality and viability; and improve the links between employment, shopping and services. Policy **CP12** does not allow development on a scale which could undermine the role and function of settlements according to the retail hierarchy.

### Appraisal of the 'Delivery' (HC, EI and ES) policies

#### Relevant plan policies:

- **EI1** (Key employment sites); **EI2** (Regenerating existing employment sites); **EI3** (Small employment sites); **EI4** (Development on existing employment sites in the countryside); **EI5** (Farm enterprises and diversification); **EI7** (Non-retail uses in primary frontages); **EI8** (Non-retail uses in secondary frontages); **EI9** (Floorspace thresholds for Impact Assessments); **EI10** (Provision of new tourism opportunities); **EI15** (Protection of freight facilities at Sharpness Docks).
- **ES1 – 16** (The environmental policies)

14.6.5 Policy **EI1** seeks to retain 'B class uses' at existing employment sites which achieve 'demonstrable economic enhancement'; and does not allow changes of use to non-B class uses. This should help facilitate economic growth by safeguarding the most important sites for economic and employment purposes. In addition, Policy **EI2** allows the regeneration of listed existing non-key employment sites to provide mixed use developments "*provided that... leads to investment that provides greater employment opportunities for the local community*". Policy **EI3** allows employment sites outside of employment areas to be redeveloped to housing providing that there is no net loss in employment opportunities.

14.6.6 Policies **EI4** and **EI5** cover the countryside, farms and diversification respectively. **EI4** allows, in principle, the extension of employment sites in rural areas providing it meets criteria; one of which is to facilitate the retention or growth of local employment opportunities. **EI5** allows (subject to criteria) farm diversification where it would help to support (rather than replace) farming activity. Farming is traditionally an important industry in the District, and this policy would allow farmers to continue to farm but also allow them to earn income from other streams, increasing their economic resilience and income prospects.

14.6.7 Policies **EI7** and **EI8** seek to preserve the provision of 'A Class uses' in primary and secondary frontages respectively. This should help to sustain the retail role and function of settlements in the District. Policy **EI9** sets the floorspace thresholds for impact assessment according to the retail hierarchy; preventing adverse impacts on existing retail provision. This policy should preserve the role and function of settlements in the District.



14.6.8 Tourism development is covered by Policy **E110** which allows (subject to criteria) tourism development (including attractions and accommodation) within the first two tiers of settlements in the District. Importantly – given the need to maintain landscape and historic character – there is a requirement that “the scale, design and use of the proposal is compatible with its wider landscape setting and would not detract from any acknowledged biodiversity interest, character or appearance of the landscape or settlement”. The supporting text goes on to state that: *“Stroud District’s built and natural environment is a key part of the tourism product and the future success of the area’s tourism industry is, in many ways, dependent on the effective management and conservation of the environment.”*

14.6.9 Also, the following policy measures will have positive implications:

- Policy **E115** seeks to support the viability of Sharpness docks in handling freight and undertaking shipping repairs.
- The environmental policies (**ES1 – 16**) would improve the quality of the natural and built environment. This could benefit tourism and agriculture; as well as helping draw businesses to the District through providing a high quality environment which is attractive to business. For example, Policy **ES11** seeks to restore and regenerate the District’s canal network which could have a positive effect on tourism in the area.

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14.6.10 The preferred spatial strategy is geared towards achieving targeted employment growth and regeneration and hence should result in **significant positive effects** in terms of the objectives to “Support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth” and “Develop the local economy within its environmental limits”. The core and delivery policies will help to ensure opportunities for employment growth and regeneration are fully realised. They will also support the achievement of other economic objectives including through supporting the rural economy, town centre ‘functionality’ and tourism.

Allocation of the ‘reserve site’ at **West of Stonehouse** would support the potential for this area to develop as a major employment hub, with high quality transport infrastructure (including for walking / cycling). There would be a real possibility of residents moving to the area with a view to working locally and hence there would be the potential to attract ‘knowledge industry’ employers and higher skilled residents.

**14.7 Housing**

Relevant sustainability objectives

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

Appraisal of CP2 (Strategic locations) and the ‘Strategic Allocation’ (SA) policies

14.7.1 The preferred strategy seeks to address objectively assessed housing needs at the district-scale. As such, provision is made for 9,500 new homes up to 2031. It is recognised that further evidence may come to light that identifies a need to make provision for a higher growth quantum, and for this reason a ‘reserve site’ at West of Stonehouse is included in the plan. It is also recognised that *“A review of the Local Plan will give due consideration to housing proposals that are intended to meet the clearly identified needs of a neighbouring planning authority and that are set out in an adopted Local Plan”*.

14.7.2 The spatial strategy of concentrating development at a small number of locations around the District is appropriate from a perspective of seeking to meet housing need on the basis that:

- The scale of all of the development sites should be sufficient to enable delivery of a high proportion of affordable homes (i.e. homes available for less than market value to households that can demonstrate a need); and
- Dispersing growth relatively evenly across the District will help to ensure that housing need is met ‘where it arises’ to an extent. Affordable housing is needed in all parts of the District, particularly within the rural area. This is an important consideration from a community and well-being perspective given the need in rural locations for key workers such as primary school teachers and care workers.

Appraisal of the ‘Core’ (CP) policies

Relevant policies:

- **CP7** (Lifetime communities); **CP8** (New housing development); **CP9** (Affordable housing); **CP10** (Gypsy, Traveller and Travelling Showpeople sites); **CP15** (A quality living and working countryside)

14.7.3 Policy **CP7** seeks to ensure that the needs of young people, families, the elderly, people with special needs and those people belonging to minority groups with specific identified needs are considered when seeking planning permission. The effect should be that a range of housing types, sizes, values and tenures are provided. Similar positive effects should result from Policy **CP8** which requires new developments to take account of housing need as identified in the Strategic Housing Market Assessment.

14.7.4 Policy **CP9** supports the granting of planning permission for good mixes/balances of residential development, an element of which will be affordable housing in conjunction with proven affordable housing need. A requirement for 30% affordable housing at qualifying developments (i.e. developments above a certain threshold scale) through Policy CP9 should help to address some of the existing demand for affordable housing. However, it is noted in the supporting text that 30% represents a low threshold, with this being deemed appropriate due to high levels of housing need generally and a limited supply of land for housing.<sup>58</sup> It is noted that the policy approach does ‘go further’ than the existing Local Plan policy (both in terms of the proportion of affordable housing required and the site area threshold at which the need to provide affordable housing is triggered).

<sup>58</sup> Given this situation there is a need to not set affordable housing requirements that would lead to developments becoming unviable and hence developers choosing not to invest in the District.

- 14.7.5 Positive effects are also likely to result from Policy **CP10** which looks to safeguard existing authorised Gypsy, Traveller and Travelling Showpeople sites, set long-term targets for additional pitches to meet needs and ensure a five year supply of specific deliverable sites throughout the local plans lifetime. This should have positive implications in terms of the supply of decent accommodation for Gypsy, Traveller and Travelling Showpeople.
- 14.7.6 Policy **CP15** seeks to ensure that countryside quality and individual settlement identities are protected. Planning permission will not be granted for proposals outside identified settlement development limits but for a few exceptions, one of which being 'rural exception sites'. This policy should have positive implications for these locations ensuring that local affordable housing needs can be met.

#### Appraisal of the 'Delivery' (HC, EI and ES) policies

##### Relevant policies:

- **HC1** (Meeting small-scale housing need within defined settlements); **HC2** (New homes above shops in town centres); **HC3** (Strategic self-build housing provision); **HC4** (Local housing need); **HC5** (Replacement dwellings); **HC6** (Residential sub-division); **HC7** (Annexes for dependents or carers); **HC8** (Extensions to dwellings)
- **ES12** (New and better design of places)

- 14.7.7 Policy **HC1** seeks to grant permission to residential development or redevelopment within defined settlements providing that a number of criteria are met. One of these is that for larger schemes a variety of dwelling types and sizes to meet identified local needs shall be provided with potentially positive implications in terms of providing the right size and tenure of new homes. Emphasis is also placed on proposed housing being at the appropriate scale and density, with layout and design also important considerations that will have positive implications for housing quality.
- 14.7.8 Policy **HC4** will seek to ensure that local affordable housing need is met through housing sites beyond defined settlements if this need cannot be met elsewhere. Furthermore the policy looks to ensure that the gross internal floor areas of affordable dwellings comply with latest HCA standards which will have positive implications for the quality of affordable housing provided.
- 14.7.9 Policy **HC7** supports the creation of annexes on existing properties were there is a clear requirement for a dependent or full-time carer which should have positive implications for housing in terms of ensuring that provision for appropriate/specialised housing can be made where needed
- 14.7.10 Policy **ES12** seeks to ensure that the layout and design of new development proposals leads to well designed, socially integrated, high quality, successful places where people enjoy living and working. A contributory element to these aspirations is better designed buildings and the policy emphasises the importance of 'Design Quality' calling for designs that reflect/appreciate context.
- 14.7.11 The other '**HC**' policies all have positive implications in terms of meeting specific housing needs.

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- 14.7.12 It is assumed that the growth quantum is appropriate given objectively assessed housing needs arising locally, but at the same time it is recognised that this point may be up for discussion. The spatial strategy is appropriate from a perspective of wishing to address needs where they arise within the District (including within the rural area) whilst at the same time concentrating development so that delivery of a high proportion of affordable housing is 'viable'. The policy approach to ensuring that specific housing needs (e.g. the needs of Gypsies and Travellers) are addressed is appropriate, and it is recognised that the policy approach to affordable housing requirements is 'a step in the right direction'. Overall, the plan should result in **significant positive effects** in terms of the objective to "Provide affordable and decent housing to meet local needs", although this conclusion is somewhat uncertain.

Allocation of the 'reserve site' at **West of Stonehouse** would result in a greater quantum of housing development within the District, and hence there would be additional development of much needed affordable housing.

## 14.8 Landscape and cultural heritage

### Relevant sustainability objectives

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

### Appraisal of CP2 (Strategic locations) and the 'Strategic Allocation' (SA) policies

- 14.8.1 The spatial strategy focuses on locations that lie outside the Cotswolds AONB and the protected landscapes of the River Severn estuary; and as such goes some way towards minimising the impact of development on 'landscape'. North East Cam is perhaps 'more sensitive' from a landscape perspective,<sup>59</sup> but there is no reason to suggest that a 500 home development cannot be accommodated given the potential for mitigation (e.g. through design and the 'structural landscaping' measures listed in Policy SA3). The recently completed Landscape Sensitivity Analysis study concludes that there are *"Some views to elevated AONB uplands to the south available, but generally the topography orientates to the north west resulting in some locally extended views over the lowland plains and a stronger visual association with the urban area of Cam."* In comparison to North East Cam, the Hunts Grove extension is less sensitive, particularly given the location of the development beside the M5.
- 14.8.2 Directing significant growth to brownfield sites in the Stroud Valleys that are currently vacant and underused offers a chance to bring about townscape improvements and secure 'a new lease of life' for features of the valleys' unique industrial heritage. It is assumed that there will be the potential to enhance the status of the numerous Conservation Areas that are designated along the valleys. The sites identified in Policy SA1 (Stroud Valleys) all lie within the Industrial Heritage Conservation Area and specific policy and design guidance is included within the plan as well as within the Industrial Heritage Conservation Area Management Proposals SPD. For example, the supporting text to SA1 identifies that housing and employment redevelopment at Brimscombe Mill should lead to creation of a restored mill pond. The Cotswold Canals Conservation Management Plan will also be referred to when assessing proposals for physical works to the canal channel or for existing or new canal structures.
- 14.8.3 Similarly, directing growth to Sharpness Docks should support the creation of a new heritage and leisure-led tourism destination making the most of an under-realised heritage interest and hence (it is assumed) enhancing the status of the conservation area at Sharpness Docks. It is noted that a vision for the Sharpness Docks Estate has been prepared by the owners, the Canal and River Trust (a charitable trust) and that the allocation of land for mixed uses in this area is specifically to achieve stated objectives.
- 14.8.4 Other points to note from the analysis of site options presented in Appendix II include:
- None of the proposed housing site allocations receive a landscape sensitivity score above 'medium'
  - The four housing site allocations that receive a 'medium' score for landscape sensitivity are at Cam, West of Stonehouse and Sharpness.
- 14.8.5 It is also noted that the proposed strategic employment allocation at Quedgley East receives a 'medium-low' landscape sensitivity score according to the Landscape Sensitivity Analysis study.

<sup>59</sup> Relative to other locations that have been considered for growth only to be rejected – e.g. North of Stroud or around Upton St. Leonards, which is in close proximity to the AONB – North East Cam is relatively unconstrained from a landscape perspective. See the recently completed Landscape Assessment Study – [insert link] - for further information.



### Appraisal of the 'Core' (CP) policies

#### Relevant policies:

- **CP4** (Place making); **CP5** (Environmental development principles for strategic sites); **CP8** (New housing development); **CP10** (Gypsy, traveller and travelling Showpeople Sites) **CP11** (New employment development); **CP14** (High quality sustainable development); **CP15** (A quality living and working countryside)

14.8.6 Policy **CP4** should ensure that development proposals accord with the 'Mini Visions' and Guiding Principles for that locality as set out within the Plan. The policy expects proposals to apply and incorporate locally distinctive architectural styles in accordance with the particular area's characteristics. Similarly **CP8** and **CP11** should help to conserve the District's local character through the need for proposals to demonstrate that they won't "*harm the character, appearance or environment of the site or its surroundings*".

14.8.7 Policies **CP14** and **CP15** both seek to ensure that development is appropriate in design and appearance compatible with its surroundings and that it retains important landscape features including natural features for the protection of local environmental quality. In particular CP15 seeks to protect the separate identity of settlements and quality of the countryside; and seeks to ensure that replacement buildings will actually bring about environmental improvements and conversions positively contribute to the established local character and sense of place. The proactive nature of CP15 in requiring positive improvement in character and environmental quality is likely to result in positive effects in terms of the sustainability objective to conserve and enhance local landscape quality.

14.8.8 Also, the following policy measures will have positive implications:

- **CP5** (Environmental development principles for strategic sites)
- **CP10** (Gypsy, traveller and travelling Showpeople Sites)

### Appraisal of the 'Delivery' (HC, EI and ES) policies

#### Relevant policies:

- **HC1** (Meeting small-scale housing need within defined settlements); **HC3** (Strategic self-build housing provision); **HC5** (Replacement dwellings); **HC6** (Residential sub-division); **HC7** (Annexes for dependents or carers); **HC8** (Extensions to dwellings);
- **EI10** (Provision of new tourism opportunities)
- **ES2** (Renewable or low carbon energy generation); **ES7** (Landscape character); **ES10** (Valuing our historic environment and assets); **ES13** (Protection of existing open space)

14.8.9 Within defined settlement development limits Policy **HC1** requires development be of a suitable scale, layout etc that is compatible with the character and appearance of the settlement; and that it would not cause loss or damage to the landscape setting of the settlement. For replacement of dwellings outside defined development limits Policy **HC5** also requires that replacement dwellings do not detract from the character or appearance of the surroundings and local area. As a result these policies should contribute positively to the sustainability objectives to conserve and enhance landscapes and townscapes.

14.8.10 Policies **HC6**, **HC7**, **HC8** and **EI5** outline the requirements for residential sub-division, annexes and extensions, and farm enterprises and to a greater or lesser degree aim to ensure development is appropriate to local character and setting. In doing so these policies in combination should ensure that incremental development does not result in significant cumulative impacts on landscape or townscape character. In a similar way Policy **EI10** – provision of new tourism opportunities - also requires proposals to "carefully consider the need to protect landscapes and environmentally sensitive sites", again helping contribute positively to the identified sustainability objectives.

- 14.8.11 Policy **ES7** aims to ensure the conservation and enhancement of the natural and scenic beauty of the landscape within the Cotswolds AONB. It requires development proposals to conserve or enhance the special features of the different landscape characters and that priority will be given to development that demonstrates this. Furthermore, development should ensure that its location, materials choice, scale etc are sympathetic to and complement the landscape character. Specific reference to the key requirements of the sustainability objective to reinforce distinctiveness through the conservation and enhancement of landscapes should ensure a significant positive outcome for this objective within the AONB.
- 14.8.12 Policy **ES10** seeks to ensure the protection of the District's historic environment. Its requirements for desk based and field evaluation, where necessary, and that proposals which ensure conservation and, in particular, enhance heritage significance will be favoured should help maintain the District's historic environment into the future. Specifically supporting those developments that contribute to the District's distinct identity, will in particular help to address the sustainability objective requiring the reinforcement of local distinctiveness.
- 14.8.13 The following policy measures will have notable positive implications:
- **HC3** (Strategic self-build housing provision)
  - **ES13** (Protection of existing open space)
  - **ES2** (Renewable or low carbon energy generation)
- [Appraisal of the Pre-submission Plan 'as a whole'](#)
- 14.8.14 Given a baseline situation whereby development would come forward at a significant scale in a less well planned way there should be **significant positive effects** in terms of the objective to "Conserve and enhance landscapes and townscapes." That said, it is recognised that there will obviously be detrimental impacts to landscape at a local level as a result of greenfield development (for example at North East Cam). The core and delivery policies will help to ensure that the negative effects of development are avoided or mitigated and opportunities for landscape enhancement are realised (most of which will relate to conservation of the historic environment).
- 14.8.15 There is greater certainty in the conclusion that the Plan will result in **significant positive effects** in terms of the objective to "*Reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of the built and cultural heritage*". This reflects the fact that growth locations are directed to: two areas where there is an opportunity to make better use of underused / undervalued heritage assets (at Stroud Valleys and Sharpness); and other locations that are relatively unconstrained.

Allocation of the 'reserve site' at **West of Stonehouse** would result in this area being the focus of a major concentration of growth; however, it is not possible to conclude that there would be negative implications for landscape or heritage given the relatively unconstrained nature of this location. Land West of Stonehouse is identified (by the recently completed Landscape Sensitivity Analysis study) as having a 'medium-low' landscape. The boundary of the AONB is located 0.5km to the east.

**14.9 Soil**

Relevant sustainability objectives

- To protect and enhance soil quality.

Appraisal of CP2 (Strategic locations) and the ‘Strategic Allocation’ (SA) policies

- 14.9.1 The Stroud Valleys area is designated as a strategic growth location with a view to maximising the re-use of vacant and underused brownfield sites and buildings. There will also be some potential to make use of previously developed land at Sharpness. However, development at the other strategic locations will be predominantly on greenfield land.
- 14.9.2 From Appendix III of this Report it can be seen that three of the twelve sites that the Council proposes should be allocated for housing are located on greenfield land (two sites North East of Cam, the Hunts Grove Extension at Hardwicke). It is noted that the proposed strategic employment land allocation at Quedgley East is located on brownfield land (although it is also worth noting that most of the alternative sites that have been considered were also greenfield).
- 14.9.3 From Appendix III it can also be seen that allocated sites generally avoid higher quality agricultural land (only part of the proposed allocation at North East Cam intersects with an area of relatively high quality – grade 2 – agricultural land) and also that the proposed allocation at Sharpness would have the potential to make good use of contaminated land (through supporting remediation).

Appraisal of the ‘Core’ (CP) policies

Relevant policies:

- **CP14** (High quality sustainable development)

- 14.9.4 Policy **CP14** states that: *“High quality development, which protects, conserves and enhances the built and natural environment, will be supported. Development will be supported where it achieves the following:.. 6. Re-use of previously developed land and/or the adaptation of existing buildings that make a positive contribution to the character of the site and surroundings, unless demonstrably unviable.”*
- 14.9.5 Policy CP14 also states that: *“Improvements to soil and water quality will be sought through the remediation of land contamination”*

Appraisal of the ‘Delivery’ (HC, EI and ES) policies

Relevant policies:

- N/a

- 14.9.6 None of the delivery policies result in notable implications.

Appraisal of the Pre-submission Plan ‘as a whole’

- 14.9.7 Given a baseline situation whereby development would come forward at a significant scale in a less well planned way there should be **significant positive effects** in terms of the objective to “Protect and enhance soil quality.” It appears that the Plan seeks to make best use of brownfield land by supporting an ambitious growth strategy for the Stroud Valleys. The Plan also avoids greenfield development on the best quality agricultural land and may also support remediation of contaminated land at Sharpness.

Allocation of the ‘reserve site’ at **West of Stonehouse** would result in additional greenfield development.

## 14.10 Transport and accessibility

### Relevant sustainability objectives

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

### Appraisal of CP2 (Strategic locations) and the 'Strategic Allocation' (SA) policies

- 14.10.1 The preferred spatial strategy seeks to concentrate development at several locations around the District adjacent to existing settlements. Growth at Hunts Grove and North East Cam should be sufficient to secure funding for transport infrastructure improvements to an extent where there could be a positive effect in terms of 'car dependency'. At Cam, for example, improvements to Cam and Dursley railway station will be secured (as well as an extension of the Cam and Dursley cycle path), whilst developer contributions secured through an extension at Hunts Grove will go some way towards the provision of a railway station on the Gloucester-Bristol line.
- 14.10.2 Focusing growth at the Stroud Valleys should also make the most of the opportunity to support and enhance the geographical and functional distinctness of Stroud's major 'suburbs': enhancing their self-sufficiency as communities in their own right, whilst improving accessibility and linkages with the town. Funds will be raised for environmental / public realm improvements and (in particular) restoration of canal towpaths. The canals provide a network of footpaths for outdoor recreation that would be readily accessible from the new developments. The availability of safe, off-road walking and cycling routes would reduce the need for short car journeys.
- 14.10.3 A 250 home development Sharpness is, however, less ideal from a 'transport and accessibility' perspective given that this location is somewhat isolated. It can be expected that car dependency amongst residents of Sharpness (new and existing) would remain high. It is also important to consider whether the preferred approach results in something of a missed opportunity in terms of the potential for ambitious sustainable transport measures to be implemented at West of Stonehouse.
- 14.10.4 It is also important to consider access to the strategic road network given that there is a current problem associated with high levels of 'out-commuting' (i.e. commuting out of the District) for work. North East Cam and Hunts Grove are both 'well' located in relation to the M5. However, it is assumed that any negative effect would not be significant given that targeted employment growth (skilled jobs for which Stroud residents are qualified for) will be provided alongside housing development. It is notable that the preferred spatial strategy seeks to locate housing and employment growth side by side, thereby offering opportunities to live and work within the same neighbourhood.
- 14.10.5 The key point to note from Appendix III – which presents an appraisal of housing site options – is that the majority of the proposed allocations (i.e. all except those at Cam and Hunts Grove) are located in close proximity to the canal network.

## Appraisal of the 'Core' (CP) policies

## Relevant policies:

- **CP3** (Settlement hierarchy); **CP4** (Place making); **CP5** (Environmental development principles for strategic sites); **CP6** (Infrastructure and developer contributions) **CP8** (New housing development); **CP10** (Gypsy, traveller and travelling showpeople sites); **CP11** (New employment development); **CP12** (Town centres and retailing); **CP13** (Demand management and sustainable travel measures); **CP14** (High quality sustainable development)

- 14.10.6 Policies **CP3**, **CP4** and **CP5** seek to focus and capitalise on opportunities to encourage development in areas with existing public transport infrastructure. These policies also aim to reduce car dependency within communities by both encouraging greater walking and cycling and by allowing development in these communities if required to meet specific needs. In particular **Policy CP5** (strategic sites), **CP8** (new housing development) and **CP11** (New employment development) all seek to ensure proposals are readily accessible by public transport, bicycle and foot further contributing to positive sustainability outcomes.
- 14.10.7 Policy **CP13** identifies the key transport related elements that schemes must demonstrate for planning permission to be granted. The policy encourages the prioritisation of non-car transport modes of travel – particularly at major schemes, which are also encouraged to secure improvements to existing rail, bus and walking / cycling infrastructure – but also supports appropriate vehicular parking so long as car travel associated with the development would not lead to highway problems or traffic related environmental problems. This is an appropriate approach from a transport and accessibility perspective.
- 14.10.8 Policy **CP14** – states that development will be accessible where there is “*Safe, convenient and attractive accesses on foot and by cycle and suitable connections with existing footways, bridleway, cycleways, local facilities and public transport*” and where “*It is at a location that is near to essential services and good transport links to services by means other than motor car.*”

## Appraisal of the 'Delivery' (HC, EI and ES) policies

## Relevant policies:

- **HC4** (Local housing need: exception sites);
- **EI4** (Development on existing employment sites in the countryside); **EI6** (Protecting individual and village shops, public houses and other community uses); **EI10** (Provision of new tourism opportunities); **EI12** (Promoting transport choice and accessibility); **EI13** (Protecting and extending our cycle routes); **EI14** (Provision and protection of rail stations and halts); **EI15** (Protection of freight facilities at Sharpness Docks); **EI16** (Provision of public transport facilities)
- **ES11** (Maintaining, restoring and regenerating the District's canals); **ES12** (New and better design of places); **ES15** (Provision of outdoor play space)

- 14.10.9 Policies **EI12 - EI16** are the key travel and transport policies and cover aspects of delivering infrastructure, enhancing accessibility as well as giving protection to cycle routes, rail infrastructure and the freight facilities at Sharpness Docks. The policies' specific reference to the need for an integrated public transport network, including improved walking, cycling and rail facilities, and requirements for development proponents to submit travel plans should help contribute to promoting traffic reduction and encouraging more sustainable travel patterns. However the extent to which these policies reduce reliance on the private car is uncertain as no policies actively discourage car ownership.
- 14.10.10 **Policy ES11** focuses on restoring and regenerating the District's canals. It is stated that: “*The Council will encourage the restoration of and other necessary functional improvements to the District's canals. It will seek to improve access to and along the canals to encourage use for transport and for leisure / recreational purposes.*”



14.10.11 Policy **ES12** focuses on reducing traffic conflict and creating high quality successful places in order to reduce travel. Specific reference to creating segregated pedestrian and cycle infrastructure should also help; however greater opportunities could be realised by placing greater emphasis on car free development and ‘shared’ spaces on streets.

14.10.12 Also, the following policy measures will have positive implications:

- Policy HC4 calls for affordable housing adjoining settlement development limits to be accessible to public transport and services and so may result in positive effects on air quality
- EI4 (Development on existing employment sites in the countryside)
- EI6 will allow the loss of community facilities only when adequate similar use facilities are accessible by walking or cycling (within 800m), with positive implications for air quality
- EI10 (Provision of new)
- EI13 which looks to see existing and planned cycling routes protected
- Policy EI14 looks to protect existing rail facilities from development and permit opening of passenger stations where feasible, with positive implications for air quality.
- ES15 (Provision of outdoor play space)

**Appraisal of the Pre-submission Plan ‘as a whole’**

14.10.13 Car dependency / per capita distance travelled by private car within Stroud will inevitably remain somewhat high compared to the national average given that Stroud is a rural district. However, the Plan is likely to result in an improvement on the baseline. Residents within new communities will have ‘services and facilities’ located nearby and the opportunity to make good use of ‘sustainable travel’ infrastructure (albeit most will also have good access to the major road network). Residents of existing communities will also benefit. As such, **significant positive effects** are predicted in terms of the sustainability objective to “Promote traffic reduction and encourage more sustainable alternative forms of transport”. Benefits in this respect are also important from a climate change mitigation perspective.

Allocation of the ‘reserve site’ at **West of Stonehouse** Stonehouse (Policy SA2a) would result in this area being the focus of a major concentration of growth. There would be the opportunity to realign the employment allocation (Policy SA2) as part of a comprehensive masterplan for the area (with phasing arrangements will be put in place to ensure that employment land is developed and completed in parallel with housing land completions to ensure a balanced development). There would be considerable opportunity to design in high quality walking, cycling and public transport infrastructure and ensure that new development is well linked to the nearby major employment site and Stroud town centre (including via the canal). It is also recognised that a development of this scale would secure contributions that go some way towards funding the reopening of the Stonehouse (Bristol line) railway station.

It is also important to consider access to the strategic road network given that there is a current problem associated with high levels of ‘out-commuting’ (i.e. commuting out of the District) for work. West of Stonehouse is particularly ‘well’ located in relation to the M5. However, it is assumed that any negative effect would not be significant given that targeted employment growth (skilled jobs for which Stroud residents are qualified for) would be provided alongside housing development.

**14.11 Waste**

Relevant sustainability objectives

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

Appraisal of CP2 (Strategic locations) and the ‘Strategic Allocation’ (SA) policies

14.11.1 The spatial strategy does not have a bearing on waste management related sustainability issues and there is no reason to suggest that a ‘higher growth quantum’ approach would create problems in terms of sustainable waste management.

Appraisal of the ‘Core’ (CP) policies

Relevant policies:

- CP4 (Place making); CP11 (New employment development)

14.11.2 Policy **CP4** requires that development proposals ensure adequate external storage space for waste bins, recycling materials

14.11.3 Policy **CP11** states that development proposals must “Demonstrate how the principles of industrial symbiosis<sup>60</sup> have been taken into account.”

Appraisal of the ‘Delivery’ (HC, EI and ES) policies

Relevant policies:

- ES1 (Sustainable construction and energy efficiency)

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

Appraisal of the Pre-submission Plan ‘as a whole’

14.11.5 The core / delivery policies within the Plan should have the effect of ensuring that the design of dwellings affords space for recycling and composting of waste. There is also a helpful policy reference to industrial symbiosis. However, significant effects on the waste management baseline are unlikely.

Allocation of the ‘reserve site’ at **West of Stonehouse** would result in this area being the focus of a major concentration of growth; however, there is no reason to suggest that this has implications for waste management.

<sup>60</sup> Industrial symbiosis can be defined as the sharing of services, utility, and by-product resources among diverse actors in order to add value, reduce costs and improve the environment. Proposals could, for instance, be called upon to demonstrate that they have considered how their waste could be used as a resource by other local businesses and industries; plus how they could potentially derive resources from other local businesses and industries in the locality.

**14.12 Water**

Relevant sustainability objectives

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

Appraisal of CP2 (Strategic locations) and the ‘Strategic Allocation’ (SA) policies

14.12.1 **Flood risk** is a key consideration here. Sharpness is located in an area where there is extensive flood risk, although it is recognised that risk is not uniform and hence there is the potential to direct sensitive development (i.e. residential development and buildings with community uses) to low risk areas. The Stroud Valleys are also associated with flood risk; however, like at Sharpness there is the potential to avoid this through site selection (as well as through design/construction measures). It is worth noting that climate change related uncertainty should factor when considering flood risk.

14.12.2 In terms of other ‘water’ considerations

- Sharpness is known to be constrained in terms of **wastewater and sewerage infrastructure**; although it is recognised that development would be expected to make contributions towards necessary improvements.
- It is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects in terms of **water quality** without an understanding of the design measures that will be put in place (sustainable drainage systems – SuDS – are an effective means of minimising the surface water runoff leading to pollution of water courses). It is noted that development at North East Cam would be on greenfield land adjacent to the River Cam, and hence it will be important that high quality SuDS are designed in with a view to surface water attenuation. SuDS re referenced in Policy SA3 (North East Cam).
- The supporting text to SA1 (Stroud Valleys) highlights that a priority at the Wimberley Mills and Dockyard Works site will be to deculvert the river corridor, possibly with positive implications for water quality and down-stream flood risk.

Appraisal of the ‘Core’ (CP) policies

Relevant policies:

- **CP5** (Environmental development principles for strategic sites); **CP11** (New employment development); **CP14** (High quality sustainable development)

14.12.3 **Policy CP5** identifies the need for strategic sites to have “low impact” in terms of the environment and use of resources and that proposals show how they meet the objectives of minimising water consumption and incorporating Sustainable Drainage Systems (SUDS).

14.12.4 **Policies CP11 and CP14** reinforce the need for SuDS and establish support for development that does not result in increased risk of flooding or unacceptable water pollution.

Appraisal of the 'Delivery' (HC, EI and ES) policies

Relevant policies:

- **ES1** (Sustainable construction and energy efficiency); **ES3** (Maintaining quality of life within our environmental limits); **ES4** (Water resources, quality and flood risk)

14.12.5 Delivery **Policies ES3 and ES4** focus on ensuring development doesn't result in unacceptable levels of pollution to water or flood risk on or off site, but stops short of reiterating the requirement of CP14 for *no* increased flood risk as a result of development. Policy ES4 specifically requires flood risk assessments to inform the location of future development which should help to ensure risk is avoided or mitigated. The requirement that consideration be given to the long term adoption and maintenance of SuDS should ensure those measures most appropriate to the specific requirements of the location. Explicit mention of measures to enhance ecological flood storage may result in improved flood management and lead to positive outcomes in terms of a range of sustainability objectives.

14.12.6 Another policy that could have positive implications for water, albeit to a lesser extent is **ES1** (Sustainable construction and energy efficiency).

Appraisal of the Pre-submission Plan 'as a whole'

14.12.7 In relation to the key matter of flood risk, it is not possible to conclude that the decision to allocate Sharpness as a location for growth will lead to significant negative effects, although there is a degree of uncertainty given long-term (climate change related) considerations.

14.12.8 The proposed growth quantum / spatial strategy does not give rise to any other major concerns in terms of water related issues. Detailed and locally specific policy measures are set to be put in place that will ensure that any negative effects associated with development are avoided or mitigated. The policy approach should mean that opportunities (e.g. reducing per capita water footprint) are realised to some extent, but it is not clear that significant positive effects will result.

Allocation of the 'reserve site' at **West of Stonehouse** would result in this area being the focus of a major concentration of growth. The site is understood to be unconstrained in terms of strategic 'water' considerations.

## 15 CONCLUSIONS AT THIS CURRENT STAGE

15.1.1 The appraisal has concluded that the Plan is likely to lead to significant positive effects in terms of 'economy and employment', 'housing', 'landscape and heritage', 'soil', and 'transport and accessibility' related sustainability objectives. These benefits largely relate to the carefully targeted spatial approach to growth (which can be described as a 'dispersed concentration' approach). This preferred spatial approach does not lead to any 'glaring' trade-offs; however, an alternative approach that includes allocation of a major development at West of Stonehouse would likely lead to a better performing plan in terms of socio-economic objectives.

### Recommendations at this current stage

15.1.2 It is recommended that the Council give consideration to the allocation of West of Stonehouse, which would mean that the plan as a whole follows a higher growth strategy. On the basis of the appraisal it seems that West of Stonehouse has a lot to offer as a strategic location for growth, with comparatively few draw-backs. Growth at West of Stonehouse could take the pressure of more sensitive locations in neighbouring authorities.

15.1.3 The only other recommendation made at this stage<sup>61</sup> is that appropriate wording is added to the Strategic Allocation (SA) policies (or, at least, the SA Policies for sites where viability is less likely to be a concern) with a view to encouraging delivery of low carbon energy infrastructure / district heating networks (in-line with the findings of the Stroud Carbon Footprinting Study).

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<sup>61</sup> N.B. numerous recommendations were made subsequent to the appraisal of 'working draft' Core/Delivery policies in May 2013 – see Chapter 12 in Part 2, above.



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

## 16 INTRODUCTION (TO PART 4)

The SA Report must include...

- A description of the measures envisaged concerning monitoring

16.1.1 This Part of the SA Report explains the next steps that will be taken as part of the plan-making / SA process, including in relation to monitoring.

## 17 PLAN FINALISATION, ADOPTION AND MONITORING

17.1.1 Once the period for public representations has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be 'sound'. Assuming that this is the case, the Plan (and the summary of representations received) will be submitted for Examination.

17.1.2 At Examination the Inspector will consider representations (alongside the SA Report) before then either reporting back on the Plan's soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Plan these will be prepared and then subjected to consultation.

17.1.3 Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' must be published that sets out (amongst other things) *'the measures decided concerning monitoring'*.

### 17.2 Monitoring

17.2.1 At the current stage – i.e. in the SA Report - there is a need to present *'a description of the measures envisaged concerning monitoring'* only. In-light of the appraisal findings presented in Part 3, the following is suggested.

- [Insert, recognising that a plan monitoring framework is proposed in the Pre-submission Plan document]

## APPENDIX I: REGULATORY REQUIREMENTS

Annex I of the SEA Directive prescribes the information that must be contained in the SA Report; however, interpretation of Annex I is not straightforward. The table below explains how we (URS) interpret Annex I requirements.

<u>Annex 1</u>	<u>Interpretation of Annex I</u>		
<i>The report must include...</i>	<i>The report must include...</i>		
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the Plan seeking to achieve?</i>	i.e. answer - <i>What's the scope of the SA?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'baseline'?</i>	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'		
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	i.e. answer - <i>What are the key issues that should be a focus of SA?</i>	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance		
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Any existing environmental problems / issues which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i>	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of why the alternatives dealt with were those that reasonably should have been)		
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects on the environment associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects on the environment associated with the draft plan	i.e. answer - <i>What are the appraisal findings at this current stage?</i>	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i>	

## APPENDIX II: APPRAISAL OF ‘BROAD SPATIAL STRATEGY’ ALTERNATIVES (2013)

### Introduction

As described within Part 2, above, an interim stage of plan-making / SA involved appraising five alternative spatial strategies:

	9,500 dwellings to 2031			11,500 dwellings to 2031	
	West of S’house only	No west of Stonehouse	Development at all locations	Development at all locations	West of S’house only
Residual requirement <sup>62</sup>	2400	2400	2400	4400	4400
Hunts Grove extension	-	500	500	750	-
North East Cam	-	500	500	750	-
Sharpness	-	250	250	250	-
Stroud Valleys	-	300	300	300	-
West of Stonehouse	1550	-	750	1500	3550
Council house programme	100	100	100	100	100
Windfall	750	750	-	750	750
<b>TOTAL</b>	<b>2400</b>	<b>2400</b>	<b>2400</b>	<b>4400</b>	<b>4400</b>

Interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Pre-submission Plan.

### Methodology

For each of the options, the appraisal identifies and evaluates ‘likely significant effects’ on the baseline, drawing on the sustainability topics / objectives identified through scoping (see Part 1) as a methodological framework.

Effects are predicted taking into account the criteria presented within Regulations.<sup>63</sup> So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. These effect ‘characteristics’ are described within the appraisal as appropriate. The potential for ‘cumulative’ effects is also considered.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario). In light of this, there is a need to make considerable assumptions regarding how the plan will be implemented ‘on the ground’ and what the effect on particular receptors will be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text.<sup>64</sup> In many instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible to comment on the merits of an option in more general terms. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of ‘significant effects’.

<sup>62</sup>Residual requirement equals the number of homes that must be delivered in the plan period minus the number of homes that are already committed, e.g. have planning permission. The residual requirement minus the number of homes that it is assumed will come forward as windfall sites minus the number of homes that will be delivered through the Council house programme equals the number of homes for which land must be allocated within the plan.

<sup>63</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

<sup>64</sup> It is worth noting that, as stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>): “Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification.”

**Appraisal findings: Broad spatial strategy alternatives**

- (1) 9,500 dwellings / West of Stonehouse only
- (2) 9,500 dwellings / No west of Stonehouse
- (3) 9,500 dwellings / Development spread across all locations
- (4) 11,500 dwellings / Development spread across all locations
- (5) 11,500 dwellings / West of Stonehouse only

Sustainability topic	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference				
		Opt 1	Opt 2	Opt 3	Opt 4	Opt 5
Air	<p>In descending order of preference:</p> <ul style="list-style-type: none"> <li><b>Options 1 and 5</b> perform well on the basis that growth would <u>not</u> be directed to the Gloucester Fringe. Gloucester City suffers from localised areas of poor air quality, with three Air Quality Management Areas (AQMA) designated along busy and/or congested roads.                             <ul style="list-style-type: none"> <li>N.B. It is assumed that growth can be delivered in a concentrated fashion (which would be particularly the case under Option 5) without resulting leading to traffic congestion / the worsening of air quality locally to the extent where it becomes a problem.</li> </ul> </li> <li><b>Options 2 and 3</b> perform less well on the basis that 500 homes would be directed to the Gloucester Fringe.</li> <li><b>Option 4</b> performs least well on the basis that 750 homes would be directed to the Gloucester Fringe. It is not possible to conclude that any negative implications would be significant given the distance of Hunts Grove from the nearest AQMA (XXXm).</li> </ul>	★1	2	2	3	★1
Biodiversity	<p>In descending order of preference:</p> <ul style="list-style-type: none"> <li><b>Options 1 and 5</b> perform relatively well on the basis that West of Stonehouse is unconstrained in terms of strategic biodiversity considerations. A major development of this scale should lead to the potential to ‘design-in’ green infrastructure, ensuring that the development is ‘permeable’ to species movement and newly created habitats support the functioning of the district-wide ecological network. It is suggested that <b>significant positive effects</b> would result, bearing in mind that the baseline situation is one whereby significant development would come forward in a less ‘planned’ way. It is not clear that the quantum of growth focused at West of Stonehouse (Option 5 involves a considerably greater quantum) has a bearing on the performance of the options.                             <ul style="list-style-type: none"> <li>It could be suggested that a ‘disbenefit’ of Options 1 and 2 relative to the other options relates to the fact that</li> </ul> </li> </ul>	★1	2	2	2	★1



Sustainability topic	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference				
		Opt 1	Opt 2	Opt 3	Opt 4	Opt 5
	<p>development would be entirely greenfield focused / there would be no growth focused at the Stroud Valleys (much of which is brownfield); however, it is not clear that this is a significant consideration given that the potential for housing development at Stroud Valleys is relatively limited (300 homes).</p> <ul style="list-style-type: none"> <li>• <b>Options 2, 3 and 4</b> perform less well on the basis that there could be the potential for growth at Sharpness to impact on the internationally important habitats / species assemblages associated with the Severn Estuary. This is a key consideration; however, it is not possible to conclude that effects would be 'significant' (without undertaking more detailed 'Habitats Regulations Assessment').<sup>65</sup> There could well be the potential to ensure that negative effects are avoided / mitigated.                     <ul style="list-style-type: none"> <li>• Option 4 would involve a greater amount of growth at North East Cam, a location that is potentially somewhat sensitive given its location adjacent to the River Cam. However, it is recognised that there is the potential to 'design-in' green infrastructure with a view to maintaining (or even enhancing) the role of the river as an ecological 'corridor' and also ensuring that residents benefit from good 'access to nature'.</li> </ul> </li> </ul>					
Climate change mitigation	<p>In descending order of performance:</p> <ul style="list-style-type: none"> <li>• <b>Options 1 and 5</b> perform well on the basis that all growth would come forward as part of a single development well in exceedence of the 500 home threshold level at which it is assumed<sup>66</sup> that there is potential to deliver an optimal district heating scheme, i.e. one that is powered by biomass fuelled combined heat and power (CHP).<sup>67</sup> <b>Significant positive effects</b> are predicted in terms of climate change mitigation objectives. <b>Option 5</b> is preferable to <b>Option 1</b> on the assumption that under Option 1 the 2,000 home 'shortfall' would be met (somewhere; at some point in the future) through less well planned development, i.e. through developments below the 500 home threshold.</li> <li>• <b>Options 3 and 4</b> would involve directing growth to three developments at or above the 500 home threshold. <b>Option 4</b> is preferable to <b>Option 3</b> on the basis that it provides a greater number of homes (see discussion above in relation</li> </ul>	2	5	4	3	1

<sup>65</sup> A Habitats Regulations Assessment is being produced separately by URS. It concludes that significant effects are not likely. It identifies the need to work with neighbouring Severn authorities to assist in ongoing monitoring of visitor activities and disturbance in the Severn Estuary SPA in order to inform any future changes to visitor management that may prove necessary. It is noted that a multi-authority forum (Association of Severn Estuary Relevant Authorities) already exists for monitoring and coordinating delivery of environmental management in the Severn Estuary and this would clearly be the appropriate forum for on-going participation'. With regard to Rodborough Common there is a need to ensure provision of accessible natural greenspace around Stroud Valleys.

<sup>66</sup> AMEC, 2011. Stroud Carbon Footprinting Study

<sup>67</sup> This is on the basis that biomass fuelled CHP give rise to a need space requirements for fuel storage and delivery.

Sustainability topic	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference				
		Opt 1	Opt 2	Opt 3	Opt 4	Opt 5
	<p>to Options 1 and 5).</p> <ul style="list-style-type: none"> <li>N.B. This appraisal reflects an assumption that focusing 250 homes at Sharpness and 300 homes at Stroud Valleys would afford opportunity for a <i>less</i> optimal district heating scheme<sup>68</sup>; however, in practice this may not be the case given that homes at both locations will be brought forward as part of mixed-use developments; and given that employment uses can support delivery of a viable district heating scheme.</li> <li><b>Option 2</b> would involve directing growth to only two developments at or above the 500 home threshold.</li> </ul> <p>The other major consideration relates to the potential to minimise the carbon footprint of development by enabling reduced car dependency amongst new and existing residents. The potential for options to have a bearing in this respect is considered below, under the ‘Transport and accessibility’ heading.</p>					
Community and wellbeing	<p>In descending order of performance:</p> <ul style="list-style-type: none"> <li><b>Option 4</b> performs well on the basis that it would result in concentrated development at several locations around the district adjacent to existing settlements. This approach will result in new communities located: A) where there is relatively good existing access to services and facilities; and B) where there is the potential to bring forward new services/facilities (e.g. new schools, GP surgeries and leisure provision) that require a ‘critical mass’ of people within a given area to be viable. For example, a 750 home extension to Hunts Grove will enhance the role of the Local Service Centre (already committed under the previous plan and subsequent planning permission). There will be the potential for benefits to be realised by people living within existing settlements as well as those inhabiting new developments. Ensuring good access to health services is particularly important given an ageing population. <b>Significant positive effects</b> are likely in terms of several ‘community and wellbeing’ related sustainability objectives.</li> <li><b>Options 2 and 3</b> perform less well on the basis that the developments at Hunts Grove and North East Cam will be of a smaller scale. Also, if fewer homes are delivered through the plan it may be that more homes will be delivered through other means (somewhere; at some point in the future) and potentially in a ‘less well planned’ way (i.e. not through concentrated development adjacent to existing larger settlements).</li> <li><b>Options 1 and 5</b> would concentrate development at West of Stonehouse. Development concentrated in this way could result in funding been made available for new services and facilities to the benefit of new and existing</li> </ul>	4	2	2	1	3

<sup>68</sup> i.e. one that is powered by a biomass fuelled boiler or gas fuelled CHP system.

Sustainability topic	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference				
		Opt 1	Opt 2	Opt 3	Opt 4	Opt 5
	residents locally; and – more generally - it can be suggested that a ‘highly concentrated’ growth strategy (Option 5 in particular) would lead to greater opportunity for self-containment and building of cohesive, inclusive communities. <u>However</u> , under Options 1 and 5 the ‘benefits of growth’ would not be felt by existing residents in other parts of the District. Opportunities to bring about / support regeneration at Stroud, Dursley, the Cotswold canals corridor and Sharpness Docks would be missed; and the same can also be said for opportunities to increase access to services facilities (e.g. for residents of the rural area surrounding Cam/Dursley).					
Economy and employment	<p>In descending order of performance:</p> <ul style="list-style-type: none"> <li>• <b>Option 4</b> performs well on the basis that it is a ‘higher growth’ option (11,500 dwellings to 2031) and will focus growth at locations where there is the potential to support local economic growth and/or regeneration. A key consideration relates to the need to co-locate housing growth and employment growth with a view to ensuring a suitably skilled local workforce. <b>Significant positive effects</b> are predicted in terms of economy and employment related sustainability objectives.</li> <li>• <b>Option 3</b> is a lower growth option (9,500 dwelling to 2031) but does direct growth to locations where there is the potential to support local economic growth and/or regeneration.</li> <li>• <b>Option 2</b> is a lower growth option and would not direct growth to West of Stonehouse.                             <ul style="list-style-type: none"> <li>• Demand for employment land within Stroud District is driven by demand for land close to the M5. This is reflected in demand for employment growth at Stonehouse (home to a major industrial and business area, which provides jobs for over 4,000 and has seen recent construction of office units) and the Gloucester fringe (with Hardwicke being a particular employment ‘hub’).</li> </ul> </li> <li>• <b>Option 5</b> is a higher growth option and would support the achievement of employment growth objectives at West of Stonehouse (significantly); <u>however</u>, growth would not be directed to Hunts Grove (near to the Hardwicke employment hub), Cam/Dursley (where there is an identified need for a structural shift towards employment in higher technology and light industrial activities), Sharpness or the Stroud Valleys (the latter two locations both being in need of housing growth with a view to stimulating regeneration; in particular, in both areas there is a need for housing growth with a view to encouraging employers to invest in the intensification of underused employment resources). <b>Significant negative effects</b> are predicted in terms of economy and employment related sustainability objectives.</li> <li>• <b>Option 1</b> is a lower growth option and would not direct any growth to Hunts Grove, Sharpness or Stroud Valleys.</li> </ul>	5	3	2	1	4

Sustainability topic	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference				
		Opt 1	Opt 2	Opt 3	Opt 4	Opt 5
	<p><b>Significant negative effects</b> are predicted in terms of economy and employment related sustainability objectives.</p> <p>Another consideration relates to the need to support thriving town centres so that these can continue to perform a role as centres of economic activity (as a well as a role as ‘community hubs’). It is particularly important to consider the degree of support that is given to Stroud (a town centre that struggles to maintain its retail role given competition from nearby larger towns) and Cam/Dursley (which serves an extensive rural hinterland). In terms of Stroud Town Centre it is suggested that an approach that focuses growth at West of Stonehouse only (Options 1 and 5) would perform less well than an approach that also directs growth to the Stroud Valleys (Options 2, 3 and 4) given the potential for mixed-use development here to bring about public realm enhancements, improved linkages and a boost to town centre trade.</p>					
Housing	<p>In descending order of performance:</p> <ul style="list-style-type: none"> <li>• <b>Options 4 and 5</b> perform relatively well on the basis that they would involve following a ‘high growth’ approach. This would be an effective means of addressing affordable housing need in the District, on the basis that a proportion of new housing would be affordable (i.e. available for less than market value to households that can demonstrate a need). <b>Option 4</b> performs better than <b>Option 5</b> on the basis that growth would be spread more evenly across the District, ensuring that housing need is met ‘where it arises’ to an extent. Affordable housing is certainly needed in all parts of the District – in particular within the rural area. This is an important consideration from a community and well-being perspective given the need in these locations for key workers such as primary school teachers and care workers. Option 4 is likely to result in <b>significant positive effects</b> in terms of the sustainability objective ‘to provide affordable and decent housing to meet local needs’.                     <ul style="list-style-type: none"> <li>• N.B. It is expected that the scale of all of the development sites that comprise Option 4 will be sufficient to enable delivery of a high proportion of affordable homes, i.e. there it is not assumed that a very large scale development at West of Stonehouse (Option 5) will enable delivery of a higher proportion of affordable housing.</li> </ul> </li> <li>• On a similar basis <b>Option 1</b> performs less well than <b>Options 2 and 3</b>.                     <ul style="list-style-type: none"> <li>• Option 1 is likely to result in <b>significant negative effects</b> in terms of the sustainability objective ‘to provide affordable and decent housing to meet local needs’ on the basis that it is a low growth approach and concentrates housing delivery in one area, therefore not meeting local need (market and ‘affordable’) across the District.</li> </ul> </li> </ul>	4	3	3	1	2
Landscape and	In descending order of performance:	1	1	1	2	2

Sustainability topic	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference				
		Opt 1	Opt 2	Opt 3	Opt 4	Opt 5
cultural heritage	<ul style="list-style-type: none"> <li><b>Option 1</b> performs well from a landscape perspective on the basis that it is a lower growth approach and a 'high concentration' of development would reduce the spatial extent of landscape impacts (although obviously impacts will be felt greatly at West of Stonehouse, where development would be concentrated). However, Option 1 would focus development entirely on greenfield land and not make good use of the brownfield land resource of the Stroud Valleys. Prioritising the development of brownfield sites in the Stroud Valleys that are currently vacant and underused offers a chance to bring about townscape improvements and secure 'a new lease of life' for features of the valleys' unique industrial heritage. It is assumed that there will be the potential to enhance the status of the numerous Conservation Areas that are designated along the valleys. Similarly, Option 1 would not direct growth to Sharpness Docks, where there is an opportunity to create a new heritage and leisure-led tourism destination making the most of an under-realised heritage interest and hence (it is assumed) enhancing the status of the conservation area at Sharpness Docks. On this basis, it is suggested that 'overall' in terms of this sustainability topic the performance of Option 1 is equalled by the performance of <b>Options 2 and 3</b> (which are also low growth options but would direct growth to the Stroud Valleys and Sharpness).</li> <li>On a similar basis, it is suggested that <b>Options 4 and 5</b> perform 'equally'. Option 5 would involve concentrating development, but Option 4 would direct a proportion of growth to the Stroud Valleys and Sharpness.</li> </ul> <p>One other consideration relates to the sensitivity of <b>North East Cam</b> from a landscape perspective. The recently completed Landscape Sensitivity Analysis study concludes that the site is associated with <i>"Some views to elevated AONB uplands to the south available, but generally the topography orientates to the north west resulting in some locally extended views over the lowland plains and a stronger visual association with the urban area of Cam"</i>. Option 4 would focus the most growth at North East Cam (750 homes), however at this stage it is not possible to conclude that this would lead to an adverse impact on the landscape given the potential for mitigation (e.g. through design and landscaping). It is noted that there is no obvious and easily defensible limit to potential urban expansion north east of Cam (unlike at Hunts Grove, where the expansion would abut the M5); however, there is no reason to believe that further expansion in the long term would be likely.</p>					
Soil	<p>In descending order of performance:</p> <ul style="list-style-type: none"> <li><b>Options 2 and 3</b> perform well on the basis of being lower growth options that would make good use of brownfield land and vacant / underused buildings along the Stroud Valleys (and, to a lesser extent, at Sharpness).</li> <li><b>Option 4</b> would direct the same amount of growth to brownfield land, but (being a higher growth option) would result</li> </ul>	3	★	★	2	4



Sustainability topic	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference				
		Opt 1	Opt 2	Opt 3	Opt 4	Opt 5
	<p>in the loss of a greater amount of greenfield land. <b>Significant negative effects</b> are predicted.</p> <ul style="list-style-type: none"> <li><b>Options 1 and 5</b> would direct growth entirely to greenfield land. <b>Significant negative effects</b> are predicted. Option 5 performs worse on the basis of being a higher growth option.</li> </ul>					
Transport and accessibility	<p>In descending order of performance:</p> <ul style="list-style-type: none"> <li><b>Option 4</b> performs well on the basis that it will result in concentrated development at several locations around the district adjacent to existing settlements. Growth at Hunts Grove, North East Cam and West of Stonehouse should be sufficient to secure funding for transport infrastructure improvements to an extent where there could be a positive effect in terms of ‘car dependency’. At Cam, for example, improvements to Cam and Dursley railway station would be secured (as well as an extension of the Cam and Dursley cycle path), whilst developer contributions secured through a 750 dwelling extension at Hunts Grove could go towards the provision of a railway station on the Gloucester-Bristol line. <b>Significant positive effects</b> are predicted in terms of the sustainability objective ‘to promote traffic reduction and encourage more sustainable alternative forms of transport’.</li> <li><b>Options 2 and 3</b> are lower growth options and as a result would be less likely to secure contributions for major transport infrastructure improvements.                             <ul style="list-style-type: none"> <li>N.B. A disbenefit of Options 2, 3 and 4 relates to the fact that growth (250 dwellings only) would be directed to Sharpness, a location that is somewhat isolated. It can be expected that car dependency amongst residents of Sharpness (new and existing) would remain high.</li> </ul> </li> <li><b>Option 5</b> would concentrate a large amount of growth at West of Stonehouse. A development of this scale would go some way towards securing contributions necessary to fund the reopening of the Stonehouse (Bristol line) railway station. It is also recognised that it would be possible to design in high quality walking, cycling and public transport infrastructure and ensure that new development is well linked to the nearby major employment site and Stroud town centre. <u>However</u>, there would not be the potential to fund transport infrastructure elsewhere with a view to reducing car dependency amongst existing residents. For example, in the Stroud Valleys an opportunity would be missed in terms of development supporting and enhancing the geographical and functional distinctness of Stroud’s major ‘suburbs’: enhancing their self-sufficiency as communities in their own right, whilst improving accessibility and linkages with the town.</li> <li><b>Option 1</b> performs least well on the basis that there would be less potential for ambitious sustainable transport measures to be implemented at West of Stonehouse, and also there would be missed opportunities elsewhere in the</li> </ul>	4	2	2	1	3

Sustainability topic	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference				
		Opt 1	Opt 2	Opt 3	Opt 4	Opt 5
	<p>District. <b>Significant negative effects</b> are predicted on the basis that there could be the potential for car dependency to worsen.</p> <p>It is also important to consider access to the strategic road network given that there is a current problem associated with high levels of 'out-commuting' (i.e. commuting out of the District) for work. West of Stonehouse is particularly 'well' located in relation to the M5. However, it is assumed that any negative effect would not be significant given that targeted employment growth (skilled jobs for which Stroud residents are qualified for) would be provided alongside housing development.</p>					
Waste	The plan approach to addressing the issue total growth quantum / broad distribution does not have a bearing on waste management related sustainability issues, i.e. it is not possible to come to any conclusions on the likely effects of the alternatives. There is no reason to suggest that a 'higher growth quantum' approach would create problems in terms of sustainable waste management.	-	-	-	-	-
Water	<p>In descending order of performance:</p> <ul style="list-style-type: none"> <li>Options 1 and 5 perform relatively well on the basis that growth would <u>not</u> be directed to Sharpness or the Stroud Valleys.                             <ul style="list-style-type: none"> <li>Sharpness performs poorly in relation to 'water' related sustainability objectives on two counts: Firstly, Sharpness is located within an area of flood risk, although it is recognised that flood risk is not uniform and hence there is the potential to direct sensitive development (i.e. residential development and buildings with community uses) to low risk areas. Secondly, Sharpness is known to be constrained in terms of wastewater and sewerage infrastructure; although it is recognised that development would be expected to make contributions towards necessary improvements.</li> <li>The Stroud Valleys are also associated with flood risk; however, like at Sharpness there is the potential to avoid this through site selection (as well as through design/construction measures).</li> <li>N.B. There is no reason to suggest that a lower growth option (Option 1) is preferable to a higher growth option (Option 5) on the basis of 'water resource' considerations. Stroud is not a particular area of 'water stress', i.e. Stroud is not an area where water resources are depleted as a result of extraction.</li> </ul> </li> <li>Options 2, 3 and 4 perform less well on the basis that growth would be directed to Sharpness. It is <u>not</u> possible to predict <b>significant negative effects</b> given the potential to avoid and mitigate risk (as discussed above).</li> </ul>	★ 1	2	2	2	★ 1

Sustainability topic	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>				
		Opt 1	Opt 2	Opt 3	Opt 4	Opt 5
	Another consideration is water quality. In general, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place (sustainable drainage systems – SuDS – are an effective means of minimising the surface water runoff leading to pollution of water courses). It is noted that development at North East Cam would be on greenfield land adjacent to the River Cam, and hence it will be important that SuDS are designed in with a view to surface water attenuation.					

**Summary appraisal findings**

Sustainability topic	Option 1 9,500 homes / West of Stonehouse only	Option 2 9,500 homes / No west of Stonehouse	Option 3 9,500 homes / At all locations	Option 4 11,500 homes / At all locations	Option 5 11,500 homes / West of Stonehouse only
Air	1	2	2	3	1
Biodiversity	1	2	2	2	1
Climate change mitigation	2	5	4	3	1
Community and wellbeing	4	2	2	1	3
Economy and employment	5	3	2	1	4
Housing	4	3	3	1	2
Landscape / heritage	1	1	1	2	2
Soil	3	1	1	2	4
Transport and accessibility	4	2	2	1	3
Waste	-	-	-	-	-
Water (inc. flood risk)	1	2	2	2	1

**Discussion**

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

## APPENDIX III: APPRAISAL OF SITE OPTIONS

### Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising a list of 97 housing / mixed-use site options with a view to informing the decision on those which should be allocated for housing or mixed use.

This appendix presents:

- The site options appraisal methodology; and
- Appraisal findings / 'outline reasons' for selecting preferred options.

### Site options appraisal methodology

When appraising a large number of site options there is a need to apply a methodological approach based on the use of strict 'criteria'. This methodological approach differs to that which is applied when appraising alternative / draft *policy* approaches, which is based on the use of sustainability issues/objectives.

Site appraisal criteria must be quantitative, as far as possible, with a view to minimising the need to rely on qualitative analysis. This reflects the paramount importance of ensuring a consistent appraisal of site options. Given limited site specific evidence-base<sup>69</sup> it will not be possible to undertake qualitative analysis (drawing on professional judgement) whilst at the same time ensuring accuracy / consistency.

Most of the criteria below refer to distance thresholds (e.g. *Is the site within 400m of a nationally important biodiversity site?*). It is recognised that analysis of sites in terms of distance criteria should not be the 'final word' on the merits of sites, i.e. should not lead directly to a decision on which sites to allocate. The aim of the analysis is simply to 'flag-up' potential constraints/opportunities.

**Table 1** introduces and discusses the criteria used. **Table 2** presents a concise list of the appraisal criteria used.

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<sup>69</sup> The potential to gather evidence through site visits has been / will be limited.



Table 1: Scope of the site appraisal methodology

SA objective	Appraisal criteria that have been used	Comments
<b>Air</b>		
Ensure that air quality continues to improve	N/A	<ul style="list-style-type: none"> <li>The nearest Air Quality Management Area (AQMA) at Painswick Road in Gloucester is located over 2.5km from the nearest site at Upton St Leonards. There is no reason to believe that traffic generated as a result of development at a site option would lead to a significant increase in traffic within the AQMA. It is not possible to undertake traffic modelling to confirm this.</li> </ul>
<b>Biodiversity</b>		
Create, protect, enhance, restore and connect habitats, species and/or sites of biodiversity or geological interest	<ul style="list-style-type: none"> <li>Distance to a site designated as being of European importance?</li> <li>Distance to a site designated as being of national importance?</li> <li>Distance to a site designated as being of local importance?</li> </ul>	<ul style="list-style-type: none"> <li>Ideal criteria might look at travel time to important sites (reflecting the fact that recreational impacts are a key consideration) rather than distance.</li> </ul>
<b>Climate change mitigation</b>		
Implement energy efficiency through building design to maximise the re-use of land and buildings, recycle building materials and use renewable sources of energy	N/A	<ul style="list-style-type: none"> <li>The 2011 Stroud 'Carbon Footprinting Study' did examine the potential for some sites to incorporate on-site low carbon energy; however, it did not examine all site options and so it has not been possible to draw on this as evidence to inform site options appraisal.</li> <li>The potential for development to support building integrated renewables - such as solar PV and solar heating - is not locationally dependent; hence it will not be possible to appraise site options in terms of this objective.</li> <li>Terrain / aspect can have some bearing on the potential for solar gain; however, it has not been possible to analyse site options in this respect.</li> </ul>
Implement strategies that help mitigate global warming and adapt to unavoidable climate change within the District		
<b>Community and wellbeing</b>		
Meet the challenge of a growing and ageing population	<ul style="list-style-type: none"> <li>Bus time to a Market Town?</li> <li>Bus time to a branded super-market?</li> </ul>	<ul style="list-style-type: none"> <li>Bus times have been calculated by Gloucester County Council as part of the MAIDeN project.<sup>70</sup></li> <li>Bus travel times assume travel on Tuesday morning.</li> </ul>
Maintain and improve the community's health with accessible healthcare for residents	<ul style="list-style-type: none"> <li>Bus time to a post office?</li> </ul>	<ul style="list-style-type: none"> <li>Bus travel times include the time to walk to the bus stop at both ends of the journey, with a maximum walk at each end of the journey of</li> </ul>

<sup>70</sup> See <http://www.maiden.gov.uk>

SA objective	Appraisal criteria that have been used	Comments
Increase levels of physical activity, especially among the young	<ul style="list-style-type: none"> <li>• Bus time to a community centre?</li> <li>• Bus time to a leisure facility?</li> <li>• Bus time to a primary retail?</li> <li>• Bus time to a primary school?</li> <li>• Bus time to a sixth form?</li> <li>• Bus time to a further education college?</li> <li>• Bus time to a doctor?</li> <li>• Bus time to a pharmacy?</li> <li>• Bus time to a minor injury unit?</li> </ul>	<p>400m. If the distance from the origin to destination is less than 400m, the time will actually be all walking and no public transport. Walk times assume a speed of 4.8 km/hr.</p> <ul style="list-style-type: none"> <li>• A major limitation relates to the fact that the centres of large sites will probably be more than 400m from an existing bus stop and therefore show as "not possible" to use public transport. It has only been possible to take into account existing bus stops, but in practice it will often be possible to bring forward new bus stops as part of development.</li> </ul>
Encourage social inclusion, equity, the promotion of equality and a respect for diversity	<ul style="list-style-type: none"> <li>• Location in relation to areas of relative deprivation (overall)?</li> <li>• Location in relation to areas of relative income deprivation?</li> </ul>	<ul style="list-style-type: none"> <li>• It is assumed that development can bring with it investment that will in turn help to facilitate an increase in prosperity locally / reduce spatial inequalities in terms of relative deprivation.</li> </ul>
Reduce crime and anti-social behaviour	N/A	<ul style="list-style-type: none"> <li>• Given the evidence base available, it will not be possible to identify how 'opportunity to create safe and inclusive communities' varies spatially within the district (at a resolution that would help to differentiate between site options); hence it will not be possible to appraise site options in terms of this objective.</li> </ul>
Provide access to the countryside and appropriate land for leisure and recreation use	<ul style="list-style-type: none"> <li>• Distance to a protected outdoor play space?</li> <li>• Distance to a children's play area?</li> </ul>	<ul style="list-style-type: none"> <li>• Ideally, it would be possible to examine the location of sites in relation accessible natural green space; however, datasets are not available.</li> </ul>
<b>Economy and employment</b>		
Support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth	N/A	<ul style="list-style-type: none"> <li>• Given the evidence base available, it will not be possible to identify how the potential for development to support the achievement of economic objectives varies spatially within the district (at a resolution that would help to differentiate between site options); hence it will not be possible to appraise site options in terms of this objective.</li> </ul>
Develop the local economy within its environmental limits		<ul style="list-style-type: none"> <li>• There could be the potential to examine whether</li> </ul>

SA objective	Appraisal criteria that have been used	Comments
Maintain and enhance employment opportunities within the District to meet both current and future needs		allocation of a site would lead to the loss of employment land to non-employment uses; however, this is not appropriate given that employment land is often somewhat substitutable, i.e. can be possible to develop other sites for the same of similar employment use.
<b>Housing</b>		
Provide affordable and decent housing to meet local needs	N/A	<ul style="list-style-type: none"> <li>Given the evidence base available, it will not be possible to identify how 'opportunity to address affordable housing need' varies spatially within the district (at a resolution that would help to differentiate between site options); hence it will not be possible to appraise site options in terms of this objective.</li> <li>It is not appropriate to simply examine the size of sites as a proxy for the number of homes/affordable homes that could be delivered (taking into account the assumption that larger developments can deliver a higher proportion of affordable housing). This is on the basis that sites will often eventually be brought forward in combination.</li> </ul>
<b>Landscape and cultural heritage</b>		
Reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of the built and cultural heritage	<ul style="list-style-type: none"> <li>Distance to a Conservation Area?</li> <li>Distance to a Listed Building?</li> </ul>	<ul style="list-style-type: none"> <li>Ideally, it would be possible to define the spatial extent of the 'setting' of locally heritage assets and then examine whether site options fall within this area; however, data limitations mean that this is not possible.</li> <li>'Distance to a Registered Park/Garden' has been omitted from the site appraisal criteria as all but two of the sites are over 1km from the nearest Registered Park or Garden. None are within 400m.</li> <li>'Distance to a Scheduled Ancient Monument' has been omitted from the site appraisal criteria as all but seven of the sites are located over 800m from the nearest Scheduled Ancient Monument. None are within 400m.</li> </ul>
Conserve and enhance landscapes and townscapes	<ul style="list-style-type: none"> <li>Landscape sensitivity?</li> </ul>	<ul style="list-style-type: none"> <li>A landscape assessment study has been carried out and on the basis of this study it is possible to categorise each site in terms of 'landscape sensitivity' with a view to understanding more about the capacity to accept development with minimal landscape impacts. Details of the landscape assessment work are available @ <a href="#">XXX</a>. It is important to note that the landscape assessment did not examine each and every site option individually. Rather, 40 'locations' were assessed with some of these locations containing numerous sites.</li> </ul>

SA objective	Appraisal criteria that have been used	Comments
<b>Soil</b>		
Protect and enhance soil quality	<ul style="list-style-type: none"> <li>Loss of high quality agricultural land?</li> <li>Loss of greenfield land / good use of brownfield land?</li> <li>Good use of contaminated land?</li> </ul>	<ul style="list-style-type: none"> <li>It is assumed that development can facilitate the remediation of contaminated land.</li> </ul>
<b>Transport and accessibility</b>		
Promote traffic reduction and encourage more sustainable alternative forms of transport	<ul style="list-style-type: none"> <li>Distance to a cycle route?</li> </ul>	<ul style="list-style-type: none"> <li>Ideally, it would be possible to undertake traffic modelling with a view to establishing whether development at a given location would contribute to congestion on the road network.</li> </ul>
Restore, manage and promote the canal towpaths as part of the sustainable transport infrastructure	<ul style="list-style-type: none"> <li>Proximity to the Stroudwater Navigation, Thames and Severn Canal or Gloucester and Sharpness Canal?</li> </ul>	<ul style="list-style-type: none"> <li>It is assumed that development can facilitate restoration/regeneration of canal corridors).</li> </ul>
<b>Waste</b>		
Minimise the amount of waste produced, maximise the amount of material that is reused or recycled, and seek to recover energy from the largest proportion of the residual material	N/A	<ul style="list-style-type: none"> <li>The potential for development to support sustainable waste management is not locationally dependent; hence it will not be possible to appraise site options in terms of this objective.</li> </ul>
<b>Water</b>		
Maintain and enhance the quality and quantity of ground and surface waters	N/A	<ul style="list-style-type: none"> <li>Given the evidence base available, it will not be possible to identify how the potential for development to support the achievement of water related objectives varies spatially within the district (at a resolution that would help to differentiate between site options); hence it will not be possible to appraise site options in terms of this objective.</li> <li>The presence of a groundwater Source Protection Zones (SPZs) 1 does not represent a major constraint for most (non-polluting) types of development.</li> </ul>
Manage and reduce the risk of flooding in new and existing development	<ul style="list-style-type: none"> <li>Flood risk (fluvial and coastal)?</li> <li>Surface water flood risk?</li> </ul>	

Table 2: Site appraisal criteria with performance categories<sup>71</sup>

Biodiversity		
1	Distance to a site designated as being of European importance? <sup>72</sup>	<b>R</b> = <1km <b>A</b> = 1km – 2km <b>G</b> = >2km
2	Distance to a site designated as being of national importance? <sup>73</sup>	<b>R</b> = <400m <b>A</b> = 400 – 800m <b>G</b> = >800m
3	Distance to a site designated as being of local importance? <sup>74</sup>	<b>R</b> = Intersects or is within 25m <b>A</b> = 25m – 400m <b>G</b> = >400m
Community and wellbeing		
4	Bus time to a Market Town?	<b>R</b> = >30 mins <b>A</b> = 15 – 30mins <b>G</b> = <15 mins
5	Bus time to a branded super-market?	<b>R</b> = >30 mins <b>A</b> = 15 – 30mins <b>G</b> = <15 mins
6	Bus time to a post office?	<b>R</b> = >30 mins <b>A</b> = 15 – 30mins <b>G</b> = <15 mins
7	Bus time to a community centre?	<b>R</b> = >30 mins <b>A</b> = 15 – 30mins <b>G</b> = <15 mins
8	Bus time to a leisure facility?	<b>R</b> = >30 mins <b>A</b> = 15 – 30mins <b>G</b> = <15 mins
9	Bus time to a primary retail area?	<b>R</b> = >30 mins <b>A</b> = 15 – 30mins <b>G</b> = <15 mins
10	Bus time to a primary school?	<b>R</b> = >30 mins <b>A</b> = 15 – 30mins <b>G</b> = <15 mins
11	Bus time to a sixth form?	<b>R</b> = >30 mins <b>A</b> = 15 – 30mins <b>G</b> = <15 mins
12	Bus time to a further education college?	<b>R</b> = >30 mins <b>A</b> = 15 – 30mins <b>G</b> = <15 mins

<sup>71</sup> N.B. A **red** categorisation equates to the prediction of a 'notable constraint', an **amber** categorisation equates to the prediction of a 'potential constraint', and a **green** categorisation equates to the prediction of 'no constraint'.

<sup>72</sup> Special Areas of Conservation, Special Protection Areas and 'Ramsar sites'.

<sup>73</sup> Sites of Special Scientific Interest

<sup>74</sup> There are approximately 800 Key Wildlife Sites across Gloucestershire



13	Bus time to a doctor?	<p><b>R</b> = &gt;30 mins</p> <p><b>A</b> = 15 – 30mins</p> <p><b>G</b> = &lt;15 mins</p>
14	Bus time to a pharmacy?	<p><b>R</b> = &gt;30 mins</p> <p><b>A</b> = 15 – 30mins</p> <p><b>G</b> = &lt;15 mins</p>
15	Bus time to a minor injury unit?	<p><b>R</b> = &gt;30 mins</p> <p><b>A</b> = 15 – 30mins</p> <p><b>G</b> = &lt;15 mins</p>
16	Location in relation to areas of relative deprivation (overall)? <sup>75</sup>	<p><b>R</b> = Site does not intersect with an 'output area' that is relatively deprived</p> <p><b>A</b> = Any of the site intersects with an 'output area' that is relatively deprived i.e. in the 20-40% (2<sup>nd</sup> quintile) most deprived in the district</p> <p><b>G</b> = Any of the site intersects with an 'output area' that is relatively deprived (i.e. in the 0-20% (1<sup>st</sup> quintile) most deprived in the district</p>
17	Location in relation to areas of relative income deprivation?	<p><b>R</b> = Site does not intersect with an 'output area' that is relatively deprived</p> <p><b>A</b> = Any of the site intersects with an 'output area' that is relatively deprived i.e. in the 20-40% (2<sup>nd</sup> quintile) most deprived in the district</p> <p><b>G</b> = Any of the site intersects with an 'output area' that is relatively deprived (i.e. in the 0-20% (1<sup>st</sup> quintile) most deprived in the district</p>
18	Distance to protected outdoor space?	<p><b>R</b> = &gt;800m</p> <p><b>A</b> = 400m – 800m</p> <p><b>G</b> = &lt;400m</p>
19	Distance to a children's play area?	<p><b>R</b> = &gt;800m</p> <p><b>A</b> = 400m – 800m</p> <p><b>G</b> = &lt;400m</p>
<b>Landscape and cultural heritage</b>		
20	Location in relation to a Conservation Area?	<p><b>R</b> = Intersects with</p> <p><b>A</b> = 0 – 50m</p> <p><b>G</b> = &gt;50m</p>
21	Location in relation to a Listed Building?	<p><b>R</b> = Intersects with or is within 10m</p> <p><b>A</b> = 10 – 25m</p> <p><b>G</b> = &gt;25m</p>
22	Landscape sensitivity?	<p>Landscape sensitivity is classified using the following 'five point' scale: Low; Medium – Low; Medium; Medium – High; High</p>

<sup>75</sup> According to the 'Index of Multiple Deprivation 2010' dataset available @ <https://www.gov.uk/government/publications/english-indices-of-deprivation-2010> .

Soil		
23	Loss of high quality agricultural land?	<b>R</b> = Grade 1 or 2 <b>A</b> = Grade 3 <b>G</b> = Grade 4
24	Loss of greenfield land / good use of brownfield land?	<b>R</b> = Greenfield <b>A</b> = Mix <b>G</b> = Brownfield
25	Good use of contaminated land?	<b>A</b> = Site contains no contaminated land <b>G</b> = Site contains contaminated land
Transport and accessibility		
26	Proximity to the Stroudwater Navigation, Thames and Severn Canal or Gloucester and Sharpness Canal (opportunity to restore/regenerate canal and open up towpaths)?	<b>R</b> = >1200m <b>A</b> = 400m – 1200m <b>G</b> = <400m
27	Proximity to a National Cycle Route	<b>R</b> = >2km <b>A</b> = 1km – 2km <b>G</b> = <1km
Water		
28	Flood risk (fluvial and coastal)?	<b>R</b> = Zone 3 <b>A</b> = Zone 2 <b>G</b> = Zone 1
29	Surface water flood risk?	<b>R</b> = Deep (1 in 30 yr event) <b>A</b> = Shallow (1 in 30 yr event) <b>G</b> = Neither of the above

### Summary appraisal findings and ‘outline reasons’ for selecting preferred options

Appraisal findings in relation to each of the site options are presented in **Table 3**. Appraisal findings are then summarised further in **Table 4** (which presents site options that the Council proposes to allocate) and **Table 5** (which presents site options that the Council proposes not to allocate). Table 4 also includes text explaining why the decision to allocate sites is justified in-light of appraisal findings.

Table 3: Appraisal findings: Site options

N.B. A **red** categorisation equates to the prediction of a ‘notable constraint’, an **amber** categorisation equates to the prediction of a ‘potential constraint’, and a **green** categorisation equates to the prediction of ‘no constraint’.

Landscape sensitivity is classified using the following ‘five point’ scale: **Low (L)**<sup>76</sup>; **Medium – Low (ML)**; **Medium (M)**; **Medium – High (MH)**; **High (H)**

Sustainability topic	Biodiversity			Community and well-being															Heritage & landscape			Soil			Trans & access		Water				
	Sustainability criteria	1. Biodiversity (Euro)	2. Biodiversity (national)	3. Biodiversity (local)	4. Market town	5. Supermarket	6. Post office	7. Community centre	8. Leisure facility	9. Primary retail	10. Primary school	11. Sixth form	12. Further education	13. Doctor	14. Pharmacy	15. Minor injury unit	16. Deprivation	17. Income deprivation	18. Outdoor space	19. Children’s play area	20. Conservation Area	21. Listed building	22. Landscape sensitivity	23. Agricultural land	24. Greenfield/brownfield	25. Contaminated Land	26. Canal restoration	27. Cycle route	28. Flood risk	29. Surface flooding	
Site (with proposed allocations highlighted)																															
Land at Elstub Lane, Cam																							MH								
Land at Nortonwood, Nailsworth																							H								
Land east of the Stanley, Upton St Leonards																							MH								
Land off Bowlers Lane, Cam																							MH								
Land south of Doctor Newtons Way																							MH								
Land at Aston Down																							B								
Land at Bucketts Hill Farm, Newtown																							M								
Land east of Dursley																							M								
Land north east of Old Aerodrome Farm																							B								
Land South of Green Lane, Hardwicke																							ML								
Old MoD recreation & social club, Land at Aston Down																							B								
Upthorpe Farm, Cam																							M								
Brimcombe Mills, Thrupp																							B								

<sup>76</sup> Sites comprised entirely of brownfield were not a focus of landscape assessment and are assumed to have a ‘low’ sensitivity. These sites are labelled with a ‘B’ in Table 3.

Sustainability topic	Biodiversity			Community and well-being															Heritage & landscape		Soil			Trans & access		Water						
	Sustainability criteria	1. Biodiversity (Euro)	2. Biodiversity (national)	3. Biodiversity (local)	4. Market town	5. Supermarket	6. Post office	7. Community centre	8. Leisure facility	9. Primary retail	10. Primary school	11. Sixth form	12. Further education	13. Doctor	14. Pharmacy	15. Minor injury unit	16. Deprivation	17. Income deprivation	18. Outdoor space	19. Children's play area	20. Conservation Area	21. Listed building	22. Landscape sensitivity	23. Agricultural land	24. Greenfield/brownfield	25. Contaminated Land	26. Canal restoration	27. Cycle route	28. Flood risk	29. Surface flooding		
Brimscombe Port, Brimscombe																						B										
Daniels Industrial Estate, Bath Road, Stroud																							B									
Former Golden Valley Service Station, Brimscombe																							B									
Griffin Mills Industrial Estate, Thrupp																							B									
Ham Mill, London Road, Stroud																							B									
Hope Mills Industrial Estate, Brimscombe																							B									
Land adj football ground, London Road, Brimscombe																							B									
Land at Coaley Junction, Cam																							B									
Land at Draycott, Cam																							M									
Land between Millend Lane and Bath Road, Eastington																							M									
Land between Rowley and Upthorpe, Cam																							M									
Land north of Broadfield Road, Eastington																							ML									
Land north of Eastington																							ML									
Land north west of Oak Villa, Brimscombe																							ML									
Land off Cotswold Avenue, Eastington																							ML									
Land south of Haresfield Lane, Hardwicke																							ML									
Land south west of Canal Ironworks, Brimscombe																							B									
Land surrounding Box Road Avenue, Cam																							M									
Land to the east of Draycott Mills, Cam																							M									
Land to the north of Millend Lane, Eastington																							M									







Sustainability topic	Biodiversity			Community and well-being															Heritage & landscape		Soil			Trans & access		Water				
	1. Biodiversity (Euro)	2. Biodiversity (national)	3. Biodiversity (local)	4. Market town	5. Supermarket	6. Post office	7. Community centre	8. Leisure facility	9. Primary retail	10. Primary school	11. Sixth form	12. Further education	13. Doctor	14. Pharmacy	15. Minor injury unit	16. Deprivation	17. Income deprivation	18. Outdoor space	19. Children's play area	20. Conservation Area	21. Listed building	22. Landscape sensitivity	23. Agricultural land	24. Greenfield/brownfield	25. Contaminated Land	26. Canal restoration	27. Cycle route	28. Flood risk	29. Surface flooding	
Site (with proposed allocations highlighted)																														
Land west of The Stanley, Upton St Leonards	Y	G	G	R	Y	G	R	R	R	G	Y	R	Y	R	R	R	R	Y	R	R		MH	Y	R	Y	R	R	R	G	R
Mayos Land, Hardwicke	G	G	G	Y	G	G	R	Y	G	R	Y	G	R	R	R	G	R	R	R	R		ML	Y	R	Y	R	R	R	R	R
Rear of Perry Orchard, Upton St Leonards	Y	G	G	R	Y	G	R	R	R	G	Y	R	Y	R	R	R	R	Y	R	R		MH	Y	R	Y	R	R	R	R	R
Rodborough Fields, Rodborough	R	Y	R	G	G	G	G	G	G	Y	G	G	R	R	R	R	R	R	R	R		MH	G	R	Y	G	G	G	R	R
Site at former garden centre, off Ebley Road, Stonehouse	G	G	R	G	G	G	G	Y	G	R	Y	G	R	R	R	R	R	R	R	R		B	G	G	G	G	Y	G	R	R
South Woodchester Industrial Area	R	Y	R	G	G	G	G	Y	G	R	Y	G	R	R	R	R	R	R	R	R		B	G	G	R	G	R	R	R	R
Summerhill Equestrian Centre, Hardwicke	G	G	G	Y	G	G	R	Y	G	R	Y	G	R	R	R	R	R	R	R	R		B	Y	R	R	R	R	R	R	Y
Wades Farm, Slad Road, Stroud	G	G	G	G	Y	G	G	G	G	R	Y	G	R	R	R	R	R	Y	Y	R		MH	G	R	G	R	Y	G	G	R
Wallbridge Fields, Rodborough	R	Y	R	G	G	G	G	G	G	Y	G	G	R	R	R	R	R	R	R	R		MH	G	R	Y	G	G	G	R	R
Ecotown at Sharpness	R	R	G	Y	G	G	R	R	R	Y	G	R	R	R	R	R	Y	R	R	R		M	Y	R	R	R	G	R	R	R
Land at Hopton Road, Cam	G	G	G	G	G	G	G	Y	G	R	Y	G	R	R	R	R	R	Y	Y	R		M	G	R	Y	R	R	R	R	R
Land behind Draycott Crescent, Cam	G	G	G	G	G	G	G	G	Y	G	R	Y	G	R	R	R	R	R	R	R		ML	R	G	R	R	Y	G	R	Y
Land east of Taits Hill Road, Cam	G	Y	G	G	G	G	G	G	G	R	Y	G	R	R	R	R	R	R	R	R		M	Y	R	R	R	R	R	R	R
Land north of Hyde Lane, Whitminster	G	G	G	Y	G	G	G	Y	G	R	Y	G	R	R	R	R	R	R	R	R		M	Y	R	Y	R	R	R	R	Y
Land off Birchall Lane, Upton St Leonards	Y	G	G	R	Y	G	R	R	R	G	Y	R	Y	R	R	R	R	R	R	R		MH	Y	R	Y	R	R	R	R	R
Land off Field Lane, Cam	G	G	G	G	G	G	R	R	R	G	Y	G	R	R	R	R	R	R	R	R		MH	Y	R	Y	R	R	R	R	G
Land south east of Hyde Lane, Whitminster	G	G	Y	Y	G	G	G	Y	G	R	Y	G	R	R	R	R	R	R	R	R		M	Y	R	Y	R	R	R	R	G
Land south of High Street, Upton St Leonards	Y	G	G	R	Y	G	R	R	R	G	Y	R	Y	R	R	R	R	R	R	R		MH	Y	R	Y	R	R	R	R	G
Land south of lower Knapp farm, Cam	G	G	G	G	G	G	Y	G	G	R	Y	G	R	R	R	R	R	R	R	R		MH	Y	R	Y	R	R	R	R	Y
Land to north of community centre, Eastington	G	G	G	Y	G	G	G	Y	G	R	Y	G	R	R	R	R	R	R	R	R		ML	Y	R	Y	R	R	R	R	G



Table 4: Sites that the Council proposes to allocate: Summary appraisal findings and the Council's response / reasons for allocating

Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary analysis	The Council's reasons for allocating the site in light of appraisal findings?
	Sustainability topic	Sustainability criteria		
Brimscombe Mills, Thrupp	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community</li> <li>Landscape &amp; heritage</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>1</li> <li>16, 17</li> <li>20</li> <li>27</li> <li>28, 29</li> </ul>	<p>[TBC]</p> <p>If time allows prior to consultation it will be useful to identify instances where red scores are somewhat misrepresentative, i.e. instances of a site performing particularly badly in terms of a criteria ('red plus') or instances where the situation 'on the ground' is probably not as bad as indicated by a red score (e.g. where surface water flood risk only skirts the boundary of a site).</p>	<p>Brownfield land within settlement. Close to and makes better use of existing facilities and services. Site contributing to heritage led regeneration associated with the canal. Development can be accommodated sympathetically in relation to heritage constraints. The canal offers opportunities for flood risk mitigation measures. River wildlife corridor function will be supported and enhanced with the canal restoration. Whilst Rodborough Common SAC is close in distance terms, this site is located within the Valley bottom with limited direct accessibility to the Common Hilltops. Regeneration will provide jobs and services to tackle local economic deprivation. Development will contribute to supporting recreational activity along the canal and is well related to Noahs Ark cycle shop.</p>
Brimscombe Port, Brimscombe	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>1</li> <li>16, 17</li> <li>20, 21</li> <li>27</li> <li>28, 29</li> </ul>		<p>Brownfield land within settlement. Close to and makes better use of existing facilities and services. Site contributing to heritage led regeneration associated with the canal. Development can be accommodated sympathetically in relation to heritage constraints. The canal offers opportunities for flood risk mitigation measures. River wildlife corridor function will be supported and enhanced with the canal restoration. Whilst Rodborough Common SAC is close in distance terms, this site is located within the Valley bottom with limited direct accessibility to the Common Hilltops. Regeneration will provide jobs and services to tackle local economic deprivation. Development will contribute to supporting recreational activity along the canal and is well related to Noahs</p>



Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary analysis	The Council's reasons for allocating the site in light of appraisal findings?
	Sustainability topic	Sustainability criteria		
				Ark cycle shop.
Former Golden Valley Service Station, Brimscombe	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>1</li> <li>16, 17</li> <li>20, 21</li> <li>27</li> </ul>		Brownfield land within settlement. Close to and makes better use of existing facilities and services. Site contributing to heritage led regeneration associated with the canal. Development can be accommodated sympathetically in relation to heritage constraints. River wildlife corridor function will be supported and enhanced with the canal restoration. Whilst Rodborough Common SAC is close in distance terms, this site is located within the Valley bottom with limited direct accessibility to the Common Hilltops. Regeneration will provide jobs and services to tackle local economic deprivation. Development will contribute to supporting recreational activity along the canal and is well related to Noahs Ark cycle shop.
Ham Mill, London Road, Stroud	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>1, 2</li> <li>16, 17</li> <li>20, 21</li> <li>28, 29</li> </ul>		Brownfield land within settlement. Close to and makes better use of existing facilities and services. Site contributing to heritage led regeneration associated with the canal. Development can be accommodated sympathetically in relation to heritage constraints. The canal offers opportunities for flood risk mitigation measures. River wildlife corridor function will be supported and enhanced with the canal restoration. Whilst Rodborough Common SAC is close in distance terms, this site is located within the Valley bottom with limited direct accessibility to the Common Hilltops. Regeneration will provide jobs and services to tackle local economic deprivation. Development will contribute to supporting recreational activity along the canal and is well related to Noahs Ark cycle shop.

Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary analysis	The Council's reasons for allocating the site in light of appraisal findings?
	Sustainability topic	Sustainability criteria		
Hope Mills Industrial Estate, Brimscombe	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>1, 2</li> <li>16, 17</li> <li>20</li> <li>27</li> <li>28, 29</li> </ul>		<p>Brownfield land within settlement. Close to and makes better use of existing facilities and services. Site contributing to heritage led regeneration associated with the canal. Development can be accommodated sympathetically in relation to heritage constraints. The canal offers opportunities for flood risk mitigation measures. River wildlife corridor function will be supported and enhanced with the canal restoration. Whilst Rodborough Common SAC is close in distance terms, this site is located within the Valley bottom with limited direct accessibility to the Common Hilltops. Regeneration will provide jobs and services to tackle local economic deprivation. Development will contribute to supporting recreational activity along the canal and is well related to Noahs Ark cycle shop.</p>
Land at Draycott, Cam	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>12, 16, 17, 19</li> <li>23, 24</li> <li>26, 27</li> <li>28, 29</li> </ul>		<p>Site contributes towards the Council's concentration strategy by co-locating housing, employment and associated uses together. Development will provide jobs and services to tackle local economic deprivation. Makes better use of public transport services and routes. Close to existing facilities and services. Relatively unconstrained countryside. Whilst not located on a national cycle route the site is bisected by the local Cam and Dursley cycle route.</p>
Land south of Haresfield Lane, Hardwicke	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>4, 5, 6, 8, 9, 12, 13, 14, 15, 16, 17</li> <li>24</li> <li>26</li> <li>29</li> </ul>		<p>Site is located adjacent to the major strategic employment area at Waterwells and close to Gloucester City itself (which is a net importer of workers which will help tackle local economic deprivation. It is considered a sustainable supplement to what is already a significant growth area. Development will provide a new local centre with</p>

Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary analysis	The Council's reasons for allocating the site in light of appraisal findings?
	Sustainability topic	Sustainability criteria		
				services and facilities. Relatively unconstrained countryside.
Land to the east of Draycott Mills, Cam	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>7, 8, 9, 12, 16, 17</li> <li>24</li> <li>26, 27</li> <li>28, 29</li> </ul>		Appropriate place to facilitate the delivery of employment growth with the aim of creating a more self sustaining development, providing jobs for local people and wider population. Relatively unconstrained countryside. Close to existing facilities and services. Whilst not located on a national cycle route the site is bisected by the local Cam and Dursley cycle route.
Land west of Stonehouse	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Soil</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>3</li> <li>4, 7, 8, 9, 12, 15</li> <li>24</li> <li>28, 29</li> </ul>		Large site in single ownership. A large established modern business area attracting commercial and economic interest. Site can accommodate a range of development including a village centre and associated facilities and services. Relatively unconstrained countryside. Scale of development enables any limited flood risk issue to be addressed.
Strategic Land at Cheapside, Stroud	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Landscape &amp; cultural heritage</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>1, 3</li> <li>20, 21</li> <li>28</li> </ul>		Brownfield land within settlement. Close to and makes better use of existing facilities and services. Site contributing to heritage led regeneration associated with the canal. The canal offers opportunities for flood risk mitigation measures. River wildlife corridor function will be supported and enhanced with the canal restoration. Whilst Selsey and Rodborough Common are close in distance terms, this site is located within the Valley bottom with limited direct accessibility to the Common Hilltops. Development can be accommodated sympathetically in relation to heritage constraints as existing redevelopment demonstrates.
Dockyard Works, off	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> </ul>	<ul style="list-style-type: none"> <li>5, 11, 15, 16, 17, 19</li> </ul>		Brownfield land within settlement. Site contributing to heritage led regeneration associated with the canal.

Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary analysis	The Council's reasons for allocating the site in-light of appraisal findings?
	Sustainability topic	Sustainability criteria		
Knapp Lane, Brimscombe	<ul style="list-style-type: none"> <li>Landscape &amp; cultural heritage</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>20</li> <li>27</li> <li>28, 29</li> </ul>		<p>Development can be accommodated sympathetically in relation to heritage constraints. The canal offers opportunities for flood risk mitigation measures. Regeneration will provide jobs and services to tackle local economic deprivation. Development will contribute to supporting recreational activity along the canal and is well related to Noahs Ark cycle shop.</p>
Land at Wimberley Mills, Brimscombe	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>5</li> <li>11, 15, 16, 17, 18, 19</li> <li>20</li> <li>27</li> <li>28, 29</li> </ul>		<p>Brownfield land within settlement. Site contributing to heritage led regeneration associated with the canal. Close to and makes better use of existing facilities and services. Development can be accommodated sympathetically in relation to heritage constraints. The canal offers opportunities for flood risk mitigation measures. Regeneration will provide jobs and services to tackle local economic deprivation. Development will contribute to supporting recreational activity along the canal with opportunity to link with local cycle network .</p>
Strategic Land at Sharpness	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>1, 2, 3</li> <li>7, 8, 9, 12, 13, 14, 15</li> <li>20, 21</li> <li>28, 29</li> </ul>		<p>Brownfield land with an opportunity for modest mixed use development focused tightly around the docks. Will cross-subsidise the enhancement of existing employment sites here. HRA identifies that scale is appropriate to minimise any potential adverse impact. Site contributing to heritage led regeneration. Community provision associated with the new residential development will include accessible natural green space and public outdoor playing space and contributions towards off-site education provision. The ship canal provides a significant flood defence. Appropriate land uses will be sought on those areas sensitive to flood risk.</p>

Table 5: Sites that the Council proposes not to allocate: Summary appraisal findings

Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary Analysis
	Sustainability topic	Sustainability criteria	
Land at Elstub Lane, Cam	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>7, 8, 9, 12, 19</li> <li>22</li> <li>24</li> <li>26, 27</li> </ul>	[TBC] As above
Land at Nortonwood, Nailsworth	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>2</li> <li>12, 15, 16, 17, 19</li> <li>22</li> <li>24</li> <li>26</li> </ul>	
Land east of the Stanley, Upton St Leonards	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>4, 7, 8, 9, 12, 15, 16, 17, 19</li> <li>22</li> <li>24</li> <li>26, 27</li> </ul>	
Land off Bowlers Lane, Cam	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>12, 16, 17, 19</li> <li>22</li> <li>24</li> <li>26, 27</li> </ul>	
Land south of Doctor Newtons Way	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>1, 2, 3</li> <li>16, 17</li> <li>20, 22</li> <li>24</li> <li>29</li> </ul>	
Land at Aston Down	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> </ul>	<ul style="list-style-type: none"> <li>4, 5, 7, 8, 9, 11, 12, 15, 16, 17, 18, 19</li> </ul>	



Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary Analysis
	Sustainability topic	Sustainability criteria	
	<ul style="list-style-type: none"> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>27</li> </ul>	
Land at Bucketts Hill Farm, Newtown	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Soil</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>1</li> <li>4, 12, 13, 14, 15</li> <li>24</li> <li>29</li> </ul>	
Land east of Dursley	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>12, 17, 19</li> <li>24</li> <li>26, 27</li> <li>29</li> </ul>	
Land north east of Old Aerodrome Farm	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>4, 5, 7, 8, 9, 11, 12, 15, 16, 17, 18, 19</li> <li>27</li> </ul>	
Land South of Green Lane, Hardwicke	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> </ul>	<ul style="list-style-type: none"> <li>7, 15, 16, 17</li> <li>24</li> </ul>	
Old MoD recreation & social club, Land at Aston Down	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>4, 5, 7, 8, 9, 11, 12, 15, 16, 17, 18, 19</li> <li>27</li> </ul>	
Upthorpe Farm, Cam	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>12, 16</li> <li>24</li> <li>26, 27</li> <li>29</li> </ul>	
Daniels Industrial Estate, Bath Road, Stroud	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> </ul>	<ul style="list-style-type: none"> <li>1</li> <li>16, 17</li> </ul>	
Griffin Mills Industrial	<ul style="list-style-type: none"> <li>Biodiversity</li> </ul>	<ul style="list-style-type: none"> <li>1, 2</li> </ul>	

Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary Analysis
	Sustainability topic	Sustainability criteria	
Estate, Thrupp	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>16, 17, 19</li> <li>20, 21</li> <li>28, 29</li> </ul>	
Land adj football ground, London Road, Brimscombe	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>1, 2</li> <li>16, 17</li> <li>20</li> <li>27</li> <li>28, 29</li> </ul>	
Land at Coaley Junction, Cam	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>12, 16, 17, 19</li> <li>21</li> <li>23</li> <li>26</li> </ul>	
Land between Millend Lane & Bath Road, Eastington	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>15, 16, 17</li> <li>24</li> <li>27</li> </ul>	
Land between Rowley & Upthorpe, Cam	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>12, 16</li> <li>24</li> <li>26, 27</li> <li>28, 29</li> </ul>	
Land north of Broadfield Road, Eastington	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>15, 16, 17</li> <li>21</li> <li>24</li> <li>27</li> </ul>	

Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary Analysis
	Sustainability topic	Sustainability criteria	
Land north of Eastington	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>3</li> <li>7, 8, 9, 15, 16, 17</li> <li>21</li> <li>24</li> <li>27</li> <li>28, 29</li> </ul>	
Land north west of Oak Villa, Brimscombe	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Soil</li> </ul>	<ul style="list-style-type: none"> <li>1, 2</li> <li>16, 17, 29</li> <li>24</li> </ul>	
Land off Cotswold Avenue, Eastington	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>15, 16, 17</li> <li>24</li> <li>27</li> </ul>	
Land south west of Canal Ironworks, Brimscombe	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>1, 2</li> <li>16, 17</li> <li>20</li> <li>27</li> <li>29</li> </ul>	
Land surrounding Box Road Avenue, Cam	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>12, 16, 17, 19</li> <li>21</li> <li>23, 24</li> <li>26</li> </ul>	
Land to the north of Millend Lane, Eastington	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> </ul>	<ul style="list-style-type: none"> <li>4, 12, 15, 16, 17, 19</li> <li>20</li> </ul>	

Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary Analysis
	Sustainability topic	Sustainability criteria	
	<ul style="list-style-type: none"> <li>• Soil</li> <li>• Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>• 24</li> <li>• 27</li> </ul>	
Land to the rear of Nupend Farm, Nupend	<ul style="list-style-type: none"> <li>• Community &amp; well-being</li> <li>• Landscape &amp; cultural heritage</li> <li>• Soil</li> <li>• Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>• 4, 7, 8, 9, 12, 15, 16, 17, 18, 19</li> <li>• 21</li> <li>• 24</li> <li>• 27</li> </ul>	
Stafford Mills Industrial Estate, Thrupp	<ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Community &amp; well-being</li> <li>• Landscape &amp; cultural heritage</li> <li>• Water</li> </ul>	<ul style="list-style-type: none"> <li>• 1, 2, 3</li> <li>• 16, 17, 19</li> <li>• 20, 21</li> <li>• 28, 29</li> </ul>	
Strategic Land at Dudbridge, Stroud	<ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Landscape &amp; cultural heritage</li> <li>• Water</li> </ul>	<ul style="list-style-type: none"> <li>• 1, 3</li> <li>• 20, 21</li> <li>• 28, 29</li> </ul>	
Wallbridge Quay, Stroud	<ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Landscape &amp; cultural heritage</li> <li>• Water</li> </ul>	<ul style="list-style-type: none"> <li>• 1</li> <li>• 20, 21</li> <li>• 28</li> </ul>	
Folly Lane, Stroud	<ul style="list-style-type: none"> <li>• Community &amp; well-being</li> <li>• Landscape &amp; cultural heritage</li> <li>• Soil</li> <li>• Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>• 16</li> <li>• 22 (MH)</li> <li>• 24</li> <li>• 26</li> </ul>	
Brunsdon yard, Ryeford, Stonehouse	<ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Community &amp; well-being</li> <li>• Landscape &amp; cultural heritage</li> </ul>	<ul style="list-style-type: none"> <li>• 3</li> <li>• 16, 17, 19</li> <li>• 20</li> </ul>	

Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary Analysis
	Sustainability topic	Sustainability criteria	
	<ul style="list-style-type: none"> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>28, 29</li> </ul>	
Ebley Road, Stonehouse	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>3</li> <li>16, 17, 19</li> <li>20, 21</li> <li>24</li> <li>29</li> </ul>	
Grange Fields, Stroud	<ul style="list-style-type: none"> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>22 (MH)</li> <li>24</li> <li>29</li> </ul>	
Green Farm, Green Lane, Hardwicke	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>8, 9, 15, 16, 17</li> <li>24</li> <li>28</li> </ul>	
Hardwicke Green, Hardwicke	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>3</li> <li>4, 8, 9, 11, 12, 15, 16, 17</li> <li>21</li> <li>24</li> <li>28, 29</li> </ul>	
Highfields Nursery, Whitminster	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> </ul>	<ul style="list-style-type: none"> <li>8</li> <li>15, 16, 17, 19</li> </ul>	
Land adj. Brockworth Airfield, Upton St Leonards	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>2</li> <li>7, 8, 9, 12, 15, 16, 17, 19</li> <li>24</li> <li>26, 27</li> </ul>	

Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary Analysis
	Sustainability topic	Sustainability criteria	
Land adjacent to Pooles Farm, Upton St Leonards	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>4, 7, 8, 9, 12, 15, 16, 17, 19</li> <li>22 (H)</li> <li>24</li> <li>26, 27</li> </ul>	
Land at No.13 Ebley Road, Stroud	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> </ul>	<ul style="list-style-type: none"> <li>3</li> <li>16, 17, 19</li> <li>20</li> <li>24</li> </ul>	
Land at Parklands, Whitminster	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Soil</li> </ul>	<ul style="list-style-type: none"> <li>3</li> <li>8, 15, 16, 17, 19</li> <li>24</li> </ul>	
Land at Purton Cottage, Hardwicke	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> </ul>	<ul style="list-style-type: none"> <li>8, 9, 15, 16, 17</li> <li>24</li> </ul>	
Land at Sladbrook, Stroud	<ul style="list-style-type: none"> <li>Soil</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>24</li> <li>28, 29</li> </ul>	
Land at The Pilot Inn, Hardwicke	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> </ul>	<ul style="list-style-type: none"> <li>8, 9, 11, 15, 16, 17</li> <li>24</li> </ul>	
Land at Whitecroft, Nailsworth	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>3</li> <li>15, 16, 17, 19</li> <li>22 (MH)</li> <li>24</li> <li>26</li> <li>29</li> </ul>	



Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary Analysis
	Sustainability topic	Sustainability criteria	
Land at Wynnstay, Hardwicke	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>8, 15, 16, 17</li> <li>26</li> </ul>	
Land behind Farmhill Lane, Stroud	<ul style="list-style-type: none"> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>22 (MH)</li> <li>24</li> <li>29</li> </ul>	
Land behind Summer Street, Stroud	<ul style="list-style-type: none"> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> </ul>	<ul style="list-style-type: none"> <li>21</li> <li>24</li> </ul>	
Land behind Woodhouse Drive, Rodborough	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> </ul>	<ul style="list-style-type: none"> <li>1, 2, 3</li> <li>8, 9</li> <li>22 (MH)</li> <li>24</li> </ul>	
Land between 13-15 Ebley Road	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> </ul>	<ul style="list-style-type: none"> <li>3</li> <li>16, 17, 19</li> <li>20, 21</li> <li>24</li> </ul>	
Land between 9-11 Ebley Road	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>3</li> <li>16, 17, 19</li> <li>20</li> <li>24</li> <li>29</li> </ul>	
Land north west of Whitminster	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> </ul>	<ul style="list-style-type: none"> <li>3</li> <li>8, 9, 15, 16, 17, 19</li> <li>20</li> </ul>	

Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary Analysis
	Sustainability topic	Sustainability criteria	
	<ul style="list-style-type: none"> <li>• Soil</li> <li>• Water</li> </ul>	<ul style="list-style-type: none"> <li>• 23, 24</li> <li>• 28, 29</li> </ul>	
Land off Bisley Old Road, Stroud	<ul style="list-style-type: none"> <li>• Soil</li> <li>• Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>• 24</li> <li>• 26, 27</li> </ul>	
Land off Bridge Road, Ebley, Stroud	<ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Community &amp; well-being</li> <li>• Landscape &amp; cultural heritage</li> <li>• Soil</li> <li>• Water</li> </ul>	<ul style="list-style-type: none"> <li>• 3</li> <li>• 16, 17</li> <li>• 20, 21</li> <li>• 24</li> <li>• 29</li> </ul>	
Land off Butterow West, Rodborough	<ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Community &amp; well-being</li> <li>• Landscape &amp; cultural heritage</li> <li>• Soil</li> </ul>	<ul style="list-style-type: none"> <li>• 1, 2</li> <li>• 16, 17</li> <li>• 22 (MH)</li> <li>• 24</li> </ul>	
Land off Hyde Lane, Whitminster	<ul style="list-style-type: none"> <li>• Community &amp; well-being</li> <li>• Soil</li> </ul>	<ul style="list-style-type: none"> <li>• 8, 15, 16, 17, 19</li> <li>• 24</li> </ul>	
Land off The Stanley, Upton St Leonards	<ul style="list-style-type: none"> <li>• Community &amp; well-being</li> <li>• Landscape &amp; cultural heritage</li> <li>• Soil</li> <li>• Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>• 4, 8, 9, 12, 15, 16, 17, 19</li> <li>• 22 (H)</li> <li>• 24</li> <li>• 26, 27</li> </ul>	
Land south of Bays Hill, Newtown, Sharpness	<ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Community &amp; well-being</li> <li>• Soil</li> <li>• Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>• 1</li> <li>• 4, 12, 13, 14, 15</li> <li>• 24</li> <li>• 26</li> </ul>	

Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary Analysis
	Sustainability topic	Sustainability criteria	
Land south of Callowell Farm, Stroud	<ul style="list-style-type: none"> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>20, 21, 22 (MH)</li> <li>24</li> <li>29</li> </ul>	
Land south of Gloucester, at Whaddon	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>4, 7, 8, 9, 15, 16, 17, 19</li> <li>21</li> <li>23, 24</li> <li>26, 27</li> <li>28, 29</li> </ul>	
Land to the rear of Parkland Farm, Whitminster	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Soil</li> </ul>	<ul style="list-style-type: none"> <li>3</li> <li>15, 16, 17, 19</li> <li>24</li> </ul>	
Land west of The Stanley, Upton St Leonards	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>4, 7, 8, 9, 12, 15, 16, 17, 19</li> <li>22 (H)</li> <li>24</li> <li>26, 27</li> </ul>	
Mayos Land, Hardwicke	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>8, 15, 16</li> <li>24</li> <li>29</li> </ul>	
Rear of Perry Orchard, Upton St Leonards	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>4, 8, 9, 12, 15, 16, 17, 19</li> <li>22 (H)</li> <li>24</li> <li>26, 27</li> </ul>	
Rodborough Fields,	<ul style="list-style-type: none"> <li>Biodiversity</li> </ul>	<ul style="list-style-type: none"> <li>1, 3</li> </ul>	

Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary Analysis
	Sustainability topic	Sustainability criteria	
Rodborough	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>16, 17</li> <li>20, 22 (MH)</li> <li>24</li> <li>29</li> </ul>	
Site at former garden centre, off Ebley Road, Stonehouse	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> </ul>	<ul style="list-style-type: none"> <li>3</li> <li>16, 17, 19</li> <li>20</li> </ul>	
South Woodchester Industrial Area	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>1, 3</li> <li>15, 16, 17, 19</li> <li>20, 21</li> <li>26</li> <li>28, 29</li> </ul>	
Summerhill Equestrian Centre, Hardwicke	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>8, 15, 16, 17, 18, 19</li> <li>26, 27</li> <li>28</li> </ul>	
Wades Farm, Slad Road, Stroud	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>16, 19</li> <li>22 (MH)</li> <li>24</li> <li>26</li> </ul>	
Wallbridge Fields, Rodborough	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> </ul>	<ul style="list-style-type: none"> <li>1, 3</li> <li>16, 17</li> <li>21, 22 (MH)</li> <li>24</li> </ul>	

Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary Analysis
	Sustainability topic	Sustainability criteria	
Ecotown at Sharpness	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>1, 2</li> <li>7, 8, 9, 12, 13, 14, 15</li> <li>21</li> <li>24</li> <li>26</li> <li>28, 29</li> </ul>	
Land at Hopton Road, Cam	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>12, 16</li> <li>21</li> <li>24</li> <li>26, 27</li> <li>29</li> </ul>	
Land behind Draycott Crescent, Cam	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>12, 16, 17, 19</li> <li>23, 24</li> <li>26</li> </ul>	
Land east of Taits Hill Road, Cam	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>12, 15, 16, 19</li> <li>24</li> <li>26, 27</li> <li>29</li> </ul>	
Land north of Hyde Lane, Whitminster	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> </ul>	<ul style="list-style-type: none"> <li>15, 16, 17, 19</li> <li>24</li> </ul>	
Land off Birchall Lane, Upton St Leonards	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> </ul>	<ul style="list-style-type: none"> <li>4, 8, 9, 12, 15, 16, 17, 19</li> <li>21, 22 (H)</li> <li>24</li> </ul>	

Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary Analysis
	Sustainability topic	Sustainability criteria	
	<ul style="list-style-type: none"> <li>Transport &amp; accessibility</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>26, 27</li> <li>29</li> </ul>	
Land off Field Lane, Cam	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>7, 8, 9, 12, 19</li> <li>22 (MH)</li> <li>24</li> <li>26, 27</li> </ul>	
Land south east of Hyde Lane, Whitminster	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> </ul>	<ul style="list-style-type: none"> <li>15, 16, 17, 19</li> <li>24</li> </ul>	
Land south of High Street, Upton St Leonards	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>4, 8, 9, 12, 15, 16, 17, 19</li> <li>22 (H)</li> <li>24</li> <li>26, 27</li> </ul>	
Land south of lower Knapp farm, Cam	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>12, 19</li> <li>22 (MH)</li> <li>24</li> <li>26, 27</li> </ul>	
Land to north of community centre, Eastington	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>15, 16, 17</li> <li>24</li> <li>27</li> </ul>	
Land to north of Lower Knapp Farm, Cam	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>12</li> <li>16, 17, 19</li> <li>23, 24</li> <li>27</li> </ul>	



Site name	Notable constraints (i.e. 'red flags') highlighted by interim appraisal		Supplementary Analysis
	Sustainability topic	Sustainability criteria	
	<ul style="list-style-type: none"> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>29</li> </ul>	
Land to west of Lower Knapp Farm, Cam	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>7, 8, 9, 12, 16, 17, 19</li> <li>22 (MH)</li> <li>24</li> <li>26</li> </ul>	
Land West of A38, Whitminster	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Community &amp; well-being</li> <li>Landscape &amp; cultural heritage</li> <li>Soil</li> </ul>	<ul style="list-style-type: none"> <li>3</li> <li>15, 16, 17, 19</li> <li>20</li> <li>24</li> </ul>	
Land east of Courthouse gardens, Cam	<ul style="list-style-type: none"> <li>Community &amp; well-being</li> <li>Soil</li> <li>Transport &amp; accessibility</li> </ul>	<ul style="list-style-type: none"> <li>7, 8, 9, 12, 16</li> <li>24</li> <li>26, 27</li> </ul>	