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Sustainability Appraisal Report for the Stroud District Local Plan Review – Pre-submission Draft Local Plan

Appendices

Prepared by LUC
May 2021

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Contents

Appendix 1	1
Consultation comments on SA Scoping Report and SA Reports for the Emerging Strategy Paper, Draft Plan and Additional Housing Options paper	1
Appendix 2	114
Baseline Information	114
Geography	115
Population	116
Housing	116
Social Inclusion and Deprivation	118
Health	119
Culture, Leisure and Recreation	119
Education	120
Crime	121
Landscape, Biodiversity and Geodiversity	121
Historic Environment	124
Air and Water	126
Flood Risk	128
Energy and Climate Change	129
Soils	131
Resource Use/Waste and Recycling	132
Employment and Economic Activity	133
Transport	136
Tourism	138
Appendix 3	149
SA findings for Policy Options considered at the Issues and Options stage (2017)	149
Introduction	150
Chapter 1: Key Issues	150
Chapter 2: Needs	150
Chapter 3: Future Growth Strategy	153
Chapter 4: Background Studies	156
Appendix 4	157
Assumptions Informing the Appraisal of Site Options	157
Appendix 5	192
Summary of effects for and detailed SA matrices for all of the site options considered to date	192
Summary of Sustainability Appraisal findings for all of the Reasonable Site Options considered to date	193
Residential site options	218
Employment site options	488
Mixed use site options	520
Open space site options	564
Site options considered following the Emerging Strategy Paper (prior to consultation on the Draft Plan)	570
Sites options considered following the Draft Plan (November 2019) including those considered as part of the Additional Housing Options consultation (October 2020)	626
Appendix 6	660
Summary of SA effects identified for the Draft Plan and Emerging Strategy Paper	660
Stroud Draft Plan	661

Emerging Strategy Paper 679

Appendix 7 **681**
Detailed SA Matrices for site allocations in the Draft Plan and the Pre-submission Draft Local Plan 681

Appendix 8 **810**
Summary of SA Findings for the Strategic Growth Options 810
Summary of growth options appraised 811

Appendix 9 **820**
Audit Trail of Policy and Site Options 820

Appendix 1

Consultation comments on SA Scoping Report and SA Reports for the Emerging Strategy Paper, Draft Plan and Additional Housing Options paper

Table A1.1: Scoping consultation responses

Consultee	Issues raised in relation to Sustainability Appraisal (summarised where appropriate)	Response/how comment has been addressed in this SA Report
Historic England	<p>Overview Comment</p> <p>Consideration of the historic environment looks fine and provides an appropriate framework to assess relative sustainability from a heritage perspective.</p>	Comment noted, no action required.
Natural England	<p>Relevant Plans and Programmes</p> <p>Natural England has not reviewed the plans listed in the review of relevant plans and programmes. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area;</p> <ul style="list-style-type: none"> • Green infrastructure strategies • Biodiversity plans • Rights of Way Improvement Plans • Shoreline management plans • Coastal access plans • River basin management plans • AONB and National Park management plans. • Relevant landscape plans and strategies. 	<p>Noted. The relevant documents are already included in the review of plans and policies now set out in Chapter 3 of this report, i.e.:</p> <ul style="list-style-type: none"> • Strategic Framework for Green Infrastructure in Gloucestershire 2015 • Gloucestershire Nature Map • Stroud District Environment Strategy 2007-2027 • 2017-2027 Severn Estuary Strategy • The Severn Estuary Shoreline Management Plan Review (SMP2) • Cotswolds AONB Management Plan 2013-2018 • Emerging Cotswolds AONB Management Plan 2018-2023 • Severn Estuary Flood Risk Management Strategy • The 25 Year Plan to Improve the Environment • Gloucestershire Local Flood Risk Management Strategy <p>The policy review will be updated at each forthcoming stage of the SA and any new or updated plans and strategies will be included as relevant.</p>
	<p>Key Sustainability Issues – Biodiversity</p> <p>Natural England recommends that the restoration or enhancement of biodiversity is included in line with the National Planning Policy Framework. This is to be included in addition to the avoidance of damage which is already included.</p>	The Key Sustainability Issues now presented in Table 3.1 of this report have been updated to reflect the need to promote the restoration and enhancement of biodiversity in line with the NPPF.
	<p>SA Framework - Public Health</p> <p>Natural England recommends that while references relating to enhancing provision of recreational resources are included, there are none relating to impacts on existing recreational assets (quality and/or extent). It is suggested that the text "... avoids impacts on the quality and extent of existing recreational assets, such as</p>	The assumptions that have been used in the SA of development site options (see Appendix 4) determines that potential significant negative effects are identified where development in a particular location could result in the loss of an existing green infrastructure/recreation asset.

Consultee	Issues raised in relation to Sustainability Appraisal (summarised where appropriate)	Response/how comment has been addressed in this SA Report
	<p>formal or informal footpaths?" should be added to address this issue.</p>	
	<p>SA Framework - Ecological Connectivity</p> <p>Natural England recommends that there is a danger that development at land of limited biodiversity value in its own right can lead to the creation of islands of biodiversity, permanently severed from other areas. It is therefore suggested to add a sub-objective to SA objective 7 that reads "(Does the Plan) ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced?"</p>	<p>SA objective 7.1 has been amended to make reference to the need to avoid damage to ecological networks (see Table 2.2 of this report).</p>
	<p>Monitoring Framework</p> <p>Natural England highlights that the significant environmental effects of implementing the current local plan will need to be monitoring including the indicators relating to the effects of the plan on biodiversity.</p> <p>Natural England suggests including adopting the following indicators:</p> <p>Biodiversity:</p> <ul style="list-style-type: none"> • Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance. • Percentage of major developments generating overall biodiversity enhancement. • Hectares of biodiversity habitat delivered through strategic site allocations. <p>Landscape:</p> <ul style="list-style-type: none"> • Amount of new development in AONB/National Park/Heritage Coast with commentary on likely impact. <p>Green infrastructure:</p> <ul style="list-style-type: none"> • Percentage of the city's population having access to a natural greenspace within 400 metres of their home. • Length of greenways constructed. 	<p>Commented noted. The monitoring framework which is now set out in Chapter 7 of this report has drawn on the indicators suggested by Natural England as appropriate.</p>

Consultee	Issues raised in relation to Sustainability Appraisal (summarised where appropriate)	Response/how comment has been addressed in this SA Report
	<ul style="list-style-type: none"> Hectares of accessible open space per 1000 population. 	
Gloucestershire County Council	<p>Relevant Plans and Programmes - Public Health</p> <p>Stroud DC may wish to consider including the Gloucestershire Health and Wellbeing Strategy in Chapter 2 – this is a statutory document and its priorities are referenced in Chapter 3.</p>	The review of relevant plans and programmes in this SA Report (see Chapter 3) has been updated to include reference to the Gloucestershire Health and Wellbeing Strategy 2012 – 2032.
	<p>Baseline Information - Public Health</p> <p>Paragraph 3.31 refers to priorities identified by Public Health England. These are quoted in the Public Health England document referenced in the Scoping Report but are actually priorities identified locally in the Gloucestershire Health and Wellbeing Strategy.</p>	The review of relevant plans and programmes in this SA Report (see Chapter 3) has been updated to include the priorities identified in the Gloucestershire Health and Wellbeing Strategy 2012 – 2032. Furthermore the part of the baseline information relating to health (see Appendix 2) has been updated to reflect the information provided by Gloucestershire County Council.
	<p>SA Framework - Public Health</p> <p>SA objective 2 could be strengthened by including reference to narrowing health inequalities as this is identified as a key sustainability issue for Gloucestershire and Stroud in Chapter 4 (Table 4.1).</p>	An additional sub-objective has been added to SA objective 2 in the SA framework (see Table 2.2 in this report) in relation to narrowing health inequalities.
	<p>Baseline Information - Ecology</p> <p>At paragraph 3.53 the Scoping Report mentions a particular local Nature Improvement Area (NIA) but it has forgotten to mention the Cotswold Scarp NIA which partly falls within Stroud district too.</p>	The baseline information in this SA report (see Appendix 2) has been updated to include reference to the Cotswold Scarp NIA.
	<p>Baseline Information - Transport</p> <p>Paragraph 3.111 – it may be worth mentioning that land is currently safeguarded in the adopted Stroud Local Plan for two potential new stations at Hunts Grove (south of Gloucester) and Stonehouse Bristol Rd. Policy LTP PD5.1 of the Local Transport Plan sets out to explore with the rail industry the potential to open one or more new stations between Gloucester and Bristol. This will be considered again as part of the forthcoming review of the Local Transport Plan.</p>	The baseline information section in this SA report (see Appendix 2) has been updated to include reference to the potential for the new railway stations at Hunts Grove and Stonehouse Bristol Road as identified in the current Local Plan and the Local Transport Plan.

Consultee	Issues raised in relation to Sustainability Appraisal (summarised where appropriate)	Response/how comment has been addressed in this SA Report
Highways England	<p>Key Sustainability Issues and SA Framework - Transport</p> <p>Highways England welcomes the inclusion of transport and transport infrastructure in Table 4.1 of the Scoping Report as a 'key sustainability issue' for Stroud, and matters for which Plan policies seek to address. Highways England is however surprised that transport does not form its own SA objective. Instead transport is covered by sub-objectives under SA10 (air quality). These largely seek to promote sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion.</p>	<p>The objectives in the SA framework seek to address issues relating to environmental, social and economic sustainability, and therefore transport is addressed in the context of encouraging sustainable transport use and reducing car use, in relation to the relevant SA objectives. Transport itself is not one of the topics included in the SEA Regulations, and which an integrated SA/SEA is required to address, while 'air' is.</p>
	<p>SA Framework - Transport</p> <p>Highways England believes that the transport objectives of the SA/SEA could be strengthened with a further sub-objective. This could include text that seeks to 'secure appropriate development related transport infrastructure and ensure the operation and safety of the transport network, including the Strategic Road Network.'</p>	<p>As noted above, the objectives in the SA framework seek to address issues relating to environmental, social and economic sustainability, and therefore transport is addressed in the context of encouraging sustainable transport use and reducing car use. Transport itself is not one of the topics included in the SEA Regulations, and which an integrated SA/SEA is required to address.</p>
Environment Agency	<p>SA Framework - Environmental Themes</p> <p>The Environment Agency states that the themes presented appear to incorporate the 'SEA topics' suggested by Annex I(f) of the SEA Directive and appear reasonable to reflect the purpose of the local plan review and its potential environmental effects. The themes include Biodiversity, Air and Water, Flood Risk, Energy and Climate Change, Resource Use/Waste and Recycling.</p>	<p>Comment noted, no action required.</p>
	<p>SA Framework – Biodiversity</p> <p>The Environment Agency states the SA objectives and questions appear reasonable to help create, enhance and connect habitats, species and/or sites of biodiversity interest.</p>	<p>Comment noted, no action required.</p>
	<p>Baseline Information – Climate Change</p> <p>The Environment Agency states that whilst the climate change adaptation and mitigation section makes reference to the relevant sections within the NPPF and the draft revised NPPF, it should be</p>	<p>The part of the baseline information relating to climate change (see Appendix 2 in this report) has been updated to refer to Environment Agency guidance on considering climate change in planning decision as well as fluvial risk.</p>

Consultee	Issues raised in relation to Sustainability Appraisal (summarised where appropriate)	Response/how comment has been addressed in this SA Report
	<p>noted that the National Planning Practice Guidance (NPPG) refers to Environment Agency guidance on considering climate change in planning decisions which is available online: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</p> <p>In addition the Environment Agency has produced Climate Change Guidance for the local area. For fluvial risk, it should be noted that there is a need to include a different climate change allowance for climate change (peak river flows) to inform the location, impacts and design of a scheme depending on development vulnerability. For example, residential development allocations and proposals will need to consider a 35% and 70% increase for peak river flows, on top of the 1 in 100 year flood level.</p>	
	<p>SA Framework – Flood Risk</p> <p>The Environment Agency states that SA Sub-Objective 12.1 should refer to “all sources of flooding” to include fluvial, surface water, groundwater, reservoir etc.) in line with the National Planning Policy Framework (NPPF) not just fluvial flood risk and sewer flooding.</p> <p>It welcomes that SA Sub-Objective 12.2 aims to facilitate new development in areas at lower risk of flooding which accords with the sequential approach/NPPG policy aims in terms of avoiding inappropriate development in areas subject to flood risk.</p> <p>The SA could also look at ‘ensuring flood risk reduction/improvement to the flood regime’. For example, options to look at strategic flood risk management and reduction measures could be incorporated, for example flood storage improvements, which can often be linked to other wider environmental benefits such as wet washland provision, or biodiversity enhancement, if planned.</p> <p>Our indicative Flood Map for Planning (Rivers and Sea) does not include climate change allowances and primarily shows potential flooding from Main Rivers. In considering flood risk data, the limitations of our Flood Map should be acknowledged.</p>	<p>Sub-objective 12.1 has been amended to read “<i>Does the Plan reduce the risk of flooding from all sources including rivers, watercourses and sewer flooding to people and property?</i>”</p> <p>A new sub-objective 12.4 has been included under SA objective 12 to read “<i>Does the Plan promote flood risk reduction and improvement to the flood regime?</i>”</p> <p>The limitations of the Flood Map are noted and will be acknowledged in the SA as appropriate.</p> <p>Figure A2.7 which maps hydrological constraints includes surface water flooding as part of an overview of flood risk in the District.</p> <p>It is considered that the potential for development to improve or reduce flood risk is addressed under the new sub-objective 12.4.</p>

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	<p>In considering other types of flooding a reference should also be made to surface water flooding maps.</p> <p>An additional flood risk question could be 'will it (development) improve and/or reduce flood risk (betterment and flood risk reduction opportunities)?'</p>	
	<p>Relevant Plans and Programmes – Sub National</p> <p>The Environment Agency suggests that the current Severn River Basin Management Plan (published February 2016) is included within the review of relevant plans and policies Sub-National listing.</p>	<p>The review of relevant plans and policies has been updated to include the Severn River Basin Management Plan and an overview of its objectives.</p>
	<p>SA Framework – Air and Water</p> <p>The Environment Agency supports the inclusion of SA objectives and questions SA.11 and SA.13, which seek to 'protect and enhance water quality and the condition of water resources' and improve efficiency in land use through the re-use of previously developed land. To strengthen the commitment to the Water Framework Directive, a further question could be 'does the plan seek to ensure development will not result in deterioration or put further pressure on the water environment and compromise the Water Framework Directive?'. The objective could include an indicator on water quality levels within the County's main watercourses.</p>	<p>Sub-objective 11.1 has been amended to read '<i>Does the Plan seek to avoid deterioration and where possible improve the water quality of the district's rivers and inland water?</i>'</p> <p>An indicator relating to water quality levels is included in the monitoring framework in Chapter 7 of this SA Report.</p>
	<p>Overview Comment</p> <p>The Environment Agency has stated that as part of the local plan review relevant evidence bases will need to be updated, as referred to above. The scoping document should therefore include a line to commit to this.</p>	<p>Paragraph 2.7 of this SA Report refers to the fact that the review of plans, policies and programmes; the baseline information and the key sustainability issues will be updated as appropriate throughout the SA process.</p>
<p>Stonehouse Town Council</p>	<p>Scope of the SA Report</p> <p>Stonehouse Town Council has stated that the scope of the SA seems generally appropriate</p>	<p>Comment noted, no action required.</p>

Consultee	Issues raised in relation to Sustainability Appraisal (summarised where appropriate)	Response/how comment has been addressed in this SA Report
	<p>Relevant Plans and Programmes</p> <p>Stonehouse Town Council has stated that there are a number of made Neighbourhood Development Plans (NDPS), including the Stonehouse NDP, and other emerging NDPs which are relevant for inclusion.</p>	<p>The review of relevant plans and policies set out in this SA Report (see Chapter 3) has been updated to include reference to Neighbourhood Plans in the District.</p>
	<p>Baseline Information</p> <p>The following updates are suggested by Stonehouse Town Council:</p> <ul style="list-style-type: none"> • Impact of the Javelin Park Incinerator, currently under construction should be included. • Cotswold Way also runs through Stonehouse and the town is one of the few points where the Cotswold Way can easily be accessed by public transport (train and bus) and this could be of relevance to tourism and economy. • Cotswold Canals Partnership project which has recently been awarded a £9 million Heritage Lottery Fund grant to restore the Stroudwater canal from Stonehouse to Saul should be referred to. • proposals within Gloucestershire’s Local Transport Plan 2015-2031 specifically exploring the most effective approach to station development and stopping patterns on the Bristol/ Gloucester route with Stonehouse Bristol Road being a possible location for a new station should be referenced. 	<p>The baseline information (see Appendix 2 in this report) has been updated to reflect the issues raised by Stonehouse Town Council as relevant.</p>
	<p>Key Sustainability issues</p> <p>Stonehouse Town Council suggests that the issue regarding alternative modes of transport and transport infrastructure should make explicit reference to the rail network and public transport.</p>	<p>The key sustainability issue relating to transport infrastructure has been updated to refer to the current state of the rail network and public transport in the District - see Table 4.1 in this SA Report.</p>
	<p>SA Framework</p> <p>It is also stated that the SA Framework objectives would be improved by including an additional objective on moving towards a more sustainable transport infrastructure.</p>	<p>The SA objectives set out in the Scoping Report address the SEA topics identified in the SEA Regulations (see Table 5.1 in the Scoping Report). Sustainable transport is not included in the SEA Regulations as one of the topics to be covered; however it is relevant to the achievement of some of the SA objectives including in particular SA objective 10 which addresses air quality.</p>

Consultee	Issues raised in relation to Sustainability Appraisal (summarised where appropriate)	Response/how comment has been addressed in this SA Report
Stroud Town Council	<p>The consultee disputes the assumption of good air quality in Stroud town especially around Beeches Green, Merrywalks, London Road, Cainscross Road, Slad Rd at Gloucester St end and Rowcroft. It is requested that regular air quality monitoring is undertaken in these places. In sub objective 4.1 the assumption of increased car ownership supports the need for monitoring.</p> <p>The reference to the protection of the cycle routes is supported. SA1, 2 and 3 are all supported and it is suggested that greater built accessibility is added to support SA 3.2 (the growth of older people).</p> <p>The consultee highlights that SA5. 1, 2, 3, 4, and 5 are fully supported.</p> <p>The commitment to ES1 and ES2 is supported in relation to climate change. However low energy freight delivery for town centres should be added to E14 options. It is highlighted that this would link to 5.1-SA 10.2.</p>	<p>Comment noted. The information presented in the baseline information (see Appendix 2 of this SA Report, and originally presented in the Scoping Report) relating to air quality has been sourced from up-to-date information in the Stroud District Council 2017 Air Quality Annual Status Report. Air quality readings have been taken through the Council's reporting process. It is not the role of the SA process to undertake measurements of air quality. SA objective 10 seeks to ensure that the Local Plan Review through its policies and site allocations will protect air quality in Stroud District. Sub objective 10.1 in particular will consider what effect policies and site options would have on local air quality.</p> <p>It is considered that sub-objective 3.2 already addresses accessibility for older people and no changes are therefore made.</p> <p>In relation to low energy freight delivery, this issue would be covered under sustainable transport which is addressed through sub objectives 14.3 and 10.2 as the consultee has highlighted. No further changes are therefore made.</p>
South Gloucestershire Council	<p>Overview Comment</p> <p>South Gloucestershire Council have reviewed the SA Scoping Report document and consider that it meets the requirements of the EU Strategic Environmental Assessment (SEA) Directive and adequately covers the wide range of interests which should be included through the Sustainability Appraisal process.</p>	<p>Comment noted, no action required.</p>
Martin Whiteside - Environment and Development Consultant and Green District Councillor Hillside	<p>Overview comment</p> <p>The consultee raises the following issue which he wishes to be recognised through the plan preparation process:</p> <p>The SA scoping report is an extremely useful resource document which is excellent.</p> <p>When doing a sustainability appraisal on any new development (or policy guiding the development) it is essential to take a holistic view of the impact. Just looking at one easy to measure gross (as</p>	<p>Comments noted. The SA framework has been drafted to address the environment, social and economic effects that development proposed through the plan is likely to have. Although each proposal is considered against each SA objective separately, the cumulative effects of the plan are also considered through the SA.</p>

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	<p>opposed to net) issue like single dwelling travel outcomes is not sufficient or scientifically robust.</p> <p>New family housing in a rural village will have a theoretically higher transport impact than similar housing in a town centre. However, if you analyse the footprint holistically, the new housing may help keep the village school, pub and shop open. In this case its holistic net impact may be very different as it may prevent a dramatic rise in footprint from the existing community if the school, pub or shop disappears.</p> <p>Clearly this is not easy to judge, but measurement challenges is not a reason for ignoring reality.</p> <p>The danger is that one-dimensional gross sustainability appraisals are mis-used to drive a development pattern that is less rather than more sustainable.</p>	
Tom Low	<p>Relevant Plans and Policies</p> <p>The consultee identifies that under Sub-National relevant plans, paragraph 2.75, the made NDPs of the District have not been included.</p>	<p>The review of plans and policies in Chapter 3 of this SA Report has been updated to include made NDPs in the District.</p>
Persimmon Homes Severn Valley	<p>Relevant Plans and Policies</p> <p>The consultee has highlighted that the draft revised NPPF is expected to be finalised in July 2018 and will therefore provide the relevant national policy guidance for the Stroud Local Plan Review. Key changes include the introduction of a standard methodology for the calculation of housing OAN and the establishment of a housing delivery test. As a result the demonstrated housing needs in Stroud would need to increase by 42% from 448 up to 635 dwellings per annum however, in reality the increase will be higher. The Stroud Local Plan Review therefore has a key role to play in building on existing connections to the rest of the UK provided by the M5 corridor, which makes availability of employment land in this location a key area to attract businesses. Therefore a key sustainability issue is to ensure sufficient housing is located in the</p>	<p>The review of plans and programmes (presented in Chapter 3 of this SA report) has taken the changes proposed through the draft revised NPPF into consideration and will be further updated at such time that the final revised NPPF is published. Reference to the housing delivery test has been included.</p> <p>A key sustainability issue has already been identified in relation to the promotion of alternative modes of transport in the District. The sustainability of different options for locating development is being considered through the SA process, including in relation to providing access to jobs. It is not the role of the SA to determine at the Scoping stage where development should be located; rather the findings of the SA will be one of a range of factor's feeding into the Council's decision making.</p>

Consultee	Issues raised in relation to Sustainability Appraisal (summarised where appropriate)	Response/how comment has been addressed in this SA Report
	<p>same location to support business growth, for example at Cam, which also benefits from access to an existing railway station.</p>	
	<p>Key Sustainability Issues</p> <p>The consultee has stated that not all locational requirements have the same importance and should not be given the same weight. It is highlighted that for example, it is not necessary to use proximity to existing health care facilities as a key locational factor for housing. Health care and open spaces can be provided as part of a development, particularly on strategic sites. In particular, Local Green Space is a designation which should only be used in exceptional circumstances, is very restrictive and does not necessarily enable the provision of active open space facilities.</p>	<p>It is noted that new development may stimulate the provision of new services and facilities and green space; however proximity to existing facilities is still a relevant issue for consideration through the SA. Where policy requirements state that this provision is to be made as part of any development (once the Local Plan is further developed), this will be reflected in the SA scoring for that site.</p>
	<p>SA Framework</p> <p>The wording of SA objective 1 is not considered to be appropriate or in line with housing needs and requirements. This objective should be more widely worded to refer to housing needs generally rather than the narrower focus of housing to meet local needs. The SA objective should also include a sub-objective to reflect an adequate supply of land for housing which would be in line with SA objective 16 in relation to the provision of employment land. It is also highlighted that high house prices in the area should be reflected as a key social objective.</p>	<p>The wording of SA objective 1 is considered to be appropriate for the SA of a Local Plan and no changes are made.</p> <p>The key sustainability issues for Stroud have already highlighted that <i>"House prices have increased by the highest percentage within the South West when compared to the other regions of England."</i></p>
	<p>SA Framework</p> <p>The consultee has stated that the objective to maximise brownfield development is inappropriate in relation to national guidance. NPPF17, bullet point 8 encourages the effective use of land that has been previously developed (brownfield land), provided that it is not of high environmental value. Draft planning policy guidance now proposes the following wording – <i>'give substantial weight to the value of using brownfield land within settlements for homes and other identified needs and support appropriate opportunities to</i></p>	<p>Sub-objective SA13.1 has been amended in this SA Report to read: <i>"Does the Plan encourage the appropriate provision of housing development on previously developed land as opposed to greenfield sites?"</i></p> <p>Sub-objective SA13.3 has been reworded to read: <i>"Does the Plan encourage housing densities which would make efficient use of land?"</i></p>

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	<p><i>remediate despoiled, degraded, derelict, contaminated and unstable land.</i> Therefore the guidance encourages making use of brownfield land but not maximising it, with the implication that development on brownfield land could be prioritised over other land. Therefore SA13 needs to be reworded to accord with national guidance.</p> <p>It is also highlighted that maximising housing densities (SA13.3) might not always make the most efficient use of land and may increase the possibility of conflicts with other SA objectives. A more general wording such as 'housing densities should make the most efficient use of land' has been suggested.</p>	
	<p>The consultee has stated that beyond sub-objective SA6.3 which encourages the protection of existing town centres the retail objective in the SA framework is very limited.</p>	<p>SA objective 6: To maintain and improve access to all services and facilities, seeks to protect local existing services and facilities in sustainable locations as per sub-objective 6.2, which will take into consideration retail provisions in locations outside of town centres in the District. Retail issues are also relevant as part of the wider economy under SA objectives 16: employment and 17: economy.</p>
	<p>It is stated by the consultee that SA8.4 (Does the Plan prevent coalescence between settlements?) is not a sustainability objective but is a policy response and therefore is not appropriate.</p>	<p>SA objective 8 relates to conserving and enhancing the local character and distinctiveness of landscapes and townscapes and providing sustainable access to the countryside. Preventing the coalescence of settlements is relevant to the achievement of this sustainability objective as it will help to protect the distinctiveness of townscapes in the District and local character in general. No changes have therefore been made to this sub-objective.</p>
<p>Gladman Developments</p>	<p>Overview comment</p> <p>The consultee raises the following issues in relation to undertaking SA as part of the plan preparation process:</p> <p>The Council should ensure that the results of the SA process clearly justify its policy choice. In meeting the development needs of the area it should be clear for the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making and scoring should be robust, justified and transparent.</p>	<p>Policy and site options for the Local Plan are being subject to SA and the findings (along with other factors) will inform the Council's decision making at each stage. The reasons for selecting or rejecting options have been recorded in the SA Report at Appendix 7.</p> <p>The SA/SEA is being undertaken in line with the requirements of the SEA Regulations. Table 1.1 in this SA Report signposts where each of the requirements of the SEA Regulations has been met in the report, and this table will be updated and further completed at each stage of the SA to demonstrate legal compliance.</p>

Consultee	Issues raised in relation to Sustainability Appraisal (summarised where appropriate)	Response/how comment has been addressed in this SA Report
	<p>Gladman remind the Council that there have now been a number of instances where the failure to undertake a satisfactory SA has resulted in plans failing the test of legal compliance at Examination or being subjected to legal challenge. There are also numerous examples where deficiencies with SAs have led to timely suspensions of EiPs whilst Councils ensure that the SA regulations have been adequately met.</p> <p>Through this brief submission, Gladman would like to take the opportunity to remind the Council how a justified and adequate SA should be undertaken to inform the policies and allocations made through the Local Plan. This should not be a cursory exercise, but should be a fundamental part of the plan preparation process and should help to inform the decisions made by the Council. In light of experiences in other authorities, the Council need to ensure that the policy choices in the Stroud Local Plan are clearly justified by the results of the SA process. Specifically, it should be clear from the SA process why some policy options have been progressed and others rejected.</p> <p>The Planning Practice Guidance (PPG) provides a detailed explanation of the need for sustainability appraisal, its role in the plan making process and what the requirements of the process are (Ref ID: 11-005-201400306 to Ref ID: 11-045-20140306). It explains that SA is integral to the preparation of a Local Plan; and that, its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve the relevant environmental, economic and social objectives. It is a systematic process that must be carried out during the preparation of a Local Plan. Work on the SA should start at the same time that work starts on developing the plan itself and the process should be taken into account through the development of the timetable within the Local Development Scheme.</p>	<p>The SA process has commenced early in the Local Plan preparation process and will be undertaken iteratively.</p>

Consultee	Issues raised in relation to Sustainability Appraisal (summarised where appropriate)	Response/how comment has been addressed in this SA Report
Painswick Valleys Conservation Society	<p>Overview comment</p> <p>The consultee expresses its appreciation for the comprehensiveness of the study in the SA Scoping Report to support the Local Plan Review and also for its opportunity to read it.</p>	<p>Comment noted, no action required.</p>
Hunter Page Planning on behalf of Greensquare Group and Lioncourt Strategic	<p>Baseline and Key Sustainability Issues</p> <p>The consultee is promoting land at Sharpness as a new growth point. Comments relate to the following:</p> <ul style="list-style-type: none"> • The proposed methodology and scope for the SA is broadly supported by the consultee. • Edits to the baseline information in relation to ecology and biodiversity are suggested by the consultee. A change is also suggested to Figure 3.3 and it is requested that a footnote is added to paragraph 3.58 of the baseline. • In relation to employment land, the consultee has stated that the employment land situation in Stroud District is not currently up to date. • The ecological sustainability issue as identified in table 4.1 at page 49 is stated by the consultee to not fully reflect the baseline set out at para 3.58 in relation to ecology - the table only refers to international and nationally protected sites and ignores locally designated biodiversity sites. It is suggested that this issue should also be updated to reflect such sites. • Also in relation to biodiversity the consultee has stated that paragraph 109 of the NPPF highlights that biodiversity is in general decline and that impacts should be minimised on biodiversity but also net gains provided where possible and therefore that this issue should be more clearly related to biodiversity enhancement as well as protection. Significant edits are suggested to Table 4.1 in relation to biodiversity and geodiversity. • The consultee states that the baseline identifies at paragraph 3.34 that there is deficient access to open space within the District and that the issue of providing new open space is not highlighted within the key sustainability issues. 	<p>The consultee's broad support for the methodology and scope of the SA is noted.</p> <p>A number of the consultee's suggested changes to the baseline are incorporated in Appendix 2 of this SA report, although not all are considered to be appropriate or necessary.</p> <p>The headings used in Figure 3.3 (Figure A2.3 in this report) have not been amended as it is considered appropriate to categorise the designations as international, national and local. As the consultee has noted, strategic green infrastructure framework areas and SNAs are not designations; therefore these have not been added to this map of designated sites.</p> <p>A reference has been added to paragraph 3.58 of the baseline to show the source of the site condition data, in the updated baseline presented in Appendix 3 of this report.</p> <p>The consultee's point relating to the evidence base for employment land needs relates to the preparation of the Local Plan itself and not the SA directly. The SA baseline (see Appendix 2 of this report) refers to the most up-to-date available sources and will continue to be updated throughout the SA process as the evidence base is updated.</p> <p>The key sustainability issues for Stroud set out in Table 4.1 of the Scoping Report (and repeated in Table 3.1 of this report) include that "<i>Stroud District contains many areas of high ecological value including sites of international and national importance.</i>" The purpose of the table is to summarise the <u>key</u> issues, not to repeat all of the information set out in the baseline. However, the wording of the key issue has been slightly amended as suggested to also refer to local designations.</p>

Consultee	Issues raised in relation to Sustainability Appraisal (summarised where appropriate)	Response/how comment has been addressed in this SA Report
	<ul style="list-style-type: none"> The consultee states that the key sustainability issues for the District relating to transport should recognise that there is potential for some sites, such as at Sharpness, which may require significant additional transport infrastructure to open up the opportunity for further growth and connectivity to be delivered. It is stated by the consultee that the key sustainability issue which relates to the historic environment relate only to the Industrial Heritage Conservation Area and no mention is made of other elements of the historic environment in Stroud District. It is also disputed in the consultee's response whether or not inclusion of the phrase 'preserved and enhanced' in relation to the heritage assets is appropriate, and it is stated that setting is not a heritage asset its own right. 	<p>The enhancement of biodiversity is already addressed through the SA framework through SA objective 7, particularly sub-objective 7.2 which states <i>"does the Plan outline opportunities for improvements to the conservation, connection and enhancement of ecological assets, particularly at risk assets?"</i></p> <p>Some of the edits that the consultee has proposed to make to the table of key sustainability issues are reflected in Table 3.1 in this full SA Report although others are not considered appropriate.</p> <p>The key sustainability issue relating to protecting and enhancing open and green spaces has been amended (see Table 3.1 in this report) to also recognise the need to address deficits in open space.</p> <p>It is recognised that some new development sites may require significant transport infrastructure improvements. The role of the SA is to consider sustainability issues, and therefore the SA focuses on the extent to which development locations would enable the use of sustainable modes of transport, rather than requiring significant new road-based infrastructure. The SA framework already includes these considerations.</p> <p>Table 4.1 in the Scoping Report (Table 3.1 in this SA Report) includes as one of its key sustainability issues that the <i>"Industrial Heritage Conservation Area (IHCA) ... is currently <u>one of several heritage assets</u> which are included on Historic England's Heritage at Risk list. Within the District <u>areas of significant built historic importance and aesthetic quality</u> are under pressure due to new development in the District and there is a requirement for them to be preserved and enhanced."</i> This issue therefore focuses on the <u>key</u> issues, as is the purpose of the table, not to repeat the detail of the baseline information.</p> <p>In relation to the appropriateness of the terminology 'preserve and enhance', this is considered to be appropriate and Historic England has not objected to this or requested any change in its consultation comment.</p> <p>National planning policy acknowledges the importance of protecting the setting of heritage assets (NPPF paragraph 137).</p>

Consultee	Issues raised in relation to Sustainability Appraisal (summarised where appropriate)	Response/how comment has been addressed in this SA Report
	<p>SA Framework</p> <p>The consultee makes the following suggestions in relation to changes to the SA objectives:</p> <ul style="list-style-type: none"> SA objective 2 - sub objective criteria should also consider whether the plan will protect existing green infrastructure/public open space and facilitate the creation of new green infrastructure/public open space. Change suggested to sub-objective 2.2 "Does the plan encourage healthy lifestyles including providing access to the countryside and appropriate land for leisure and recreation use". SA objective 5 – a new sub-objective is suggested to read "Does the plan promote mixed use developments and encourage multiple benefits form the use of land in urban and rural areas, recognising that some open land can perform many functions?" SA objective 7 - sub objective criteria should also consider whether the plan provides opportunities for new habitat creation i.e. net biodiversity gain. SA sub-objective 9 - sub-objective 9.1 currently asks whether the plan avoids adverse effects on the District’s heritage assets. It is suggested that this is updated to state "Does the Plan preserve or enhance the District’s designated and non-designated heritage assets in a manner that is consistent with their significance..." in line with the NPPF. It is suggested that an additional SA objective is added regarding connectivity and sustainable travel e.g. "To achieve a pattern of development which minimises journey lengths and encourages the use of sustainable forms of transport (walking, cycling, bus and rail)". A sub objective could then be: "Does the plan provide opportunities to improve and enhance connectivity and sustainable travel?" SA objectives 16 and 17 – it suggested that in relation to encouraging economic growth in the District a sub-objective is added to include "Does the Plan help to support increased 	<p>Sub-objective 2.2 has been updated to read '<i>Does the Plan encourage healthy lifestyles and provide opportunities for sport and recreation, including through the provision of green infrastructure and public open space?</i>'</p> <p>The proposed new sub-objective under SA objective 5 has not been added - the provision of mixed used development has been considered through SA objective 6 and the amendments suggested may lead to a 'double-counting' of effects.</p> <p>The changes suggested to SA objective 7 relating to opportunities for net biodiversity gain are already addressed through sub-objective 7.2 which states '<i>Does the Plan outline <u>opportunities for improvements to the conservation, connection and enhancement of ecological assets, particularly at risk assets?</u></i>' No further change is therefore made.</p> <p>The changes suggested to SA objective 9 in relation to opportunities for enhancing heritage assets are already addressed through sub-objective 9.2 which states '<i>Does the Plan outline opportunities for improvements to the conservation, management and enhancement of the District’s heritage assets, particularly at risk assets?</i>' No further change is therefore made.</p> <p>Issues relating to connectivity and sustainable transport have already been addressed through SA objectives 10 and 14 in the context of air quality and climate change. Improved sustainable transport links may be a plan objective; however it is a method of achieving improved air quality which is the sustainability objective. This approach is in line with updated RTPI guidance on undertaking SEA/SA¹. No additional SA objective is therefore added.</p> <p>A new sub-objective 17.5 has been added to SA objective 17 to read: '<i>Does the Plan help to support increased economic activity throughout the District?</i>'</p>

¹ RTPI South East (January 2018) Improving the effectiveness and efficiency of SEA/SA for land use plans

Consultee	Issues raised in relation to Sustainability Appraisal (summarised where appropriate)	Response/how comment has been addressed in this SA Report
	<p>spending and economic activity at settlements within or adjacent to the District.”</p>	

Table A1.2: Consultation responses to comments on the Emerging Strategy Paper SA Report

Consultee	Representation relating to	Comment	SA Team Response
Natural England	SA rep 1 – consideration of biodiversity and geodiversity; landscape and townscape; and efficient land use	<p>Natural England welcomed the thorough approach taken to preparation of the SA.</p> <p>Comments relating to the emerging growth strategy are included specifically with regards to the themes of biodiversity and geodiversity (SA objective 7), landscape and townscape (SA objective 8) and efficient land use (including soils and best most and versatile land) (SA objective 13):</p> <ul style="list-style-type: none"> • Table 6.4 Summary of SA effects for emerging growth strategy' allocates a '- -?' (Significant adverse) score for SA7 Biodiversity. This is the only SA objective to attract such a score, highlighting the juxtaposition of the proposed new settlement immediately adjacent to the estuary with its multiple nature conservation designations and potential 'functionally linked land'. The consultee states that scale of this development also requires consideration of loss of 'best and most versatile land'. Natural England is to continue to advise the LPA in relation to this allocation. • The general trend towards avoiding those sites requiring development within the Cotswolds AONB, consistent with this designated landscape's level of protection is welcomed by the consultee. The SA Report describes partial coverage of the district using Landscape Sensitivity Analysis (LSA) and makes a case for further evidence base work to address this shortfall. The consultee states that subsequent stages of the local plan's development should take account of any gaps in LSA where these represent a material gap in the evidence base. • The consultee also highlights the commentary of the SA Report at paragraph 6.47 which states that most significant infrastructure improvements would not 	<p>Comment noted.</p> <p>The loss of greenfield land and impacts on higher value agricultural soils have been considered as part of SA objective 13 as set out in Table 2.2: SA framework for the Stroud District Local Plan Review. The emerging growth strategy (as presented in the Emerging Growth Strategy Paper) has been appraised as having significant negative effects in terms of both loss of greenfield land and higher value agricultural soils. The full effects have been described in Appendix 6 and the summary is presented in paragraph 6.40 of the main body of the SA report for the Emerging Growth Strategy Paper. The summary of these effects is presented in Appendix 6 of this report. The overall effect has been recorded as mixed minor positive and significant negative given that the strategy would also prioritise the use of brownfield sites across the district.</p> <p>The SA report has drawn on information that is available and proportionate to its strategic nature. Should further landscape sensitivity assessment work become available it will be used to inform the findings of the forthcoming iterations of the report.</p> <p>The findings of the HRA in relation to land and waterways which may be functionally linked to the Severn Estuary designations will be used to inform forthcoming iterations of the SA report, in the appraisal of the Local Plan in relation to SA objective 7: biodiversity and geodiversity.</p>

Consultee	Representation relating to	Comment	SA Team Response
		<p>come forward in close proximity to any national or international biodiversity designations and that there may be a need to identify reserve sites for housing if potential sites for development do not come forward. This commentary of the SA report has been related to comments on the HRA with regards to the need for further work to understand the distribution, extent and sensitivities of land and waterways functionally linked to the Severn Estuary designations.</p>	
Environment Agency	SA rep 2 - consideration of flood risk (SA objective 12)	<p>The consultee notes that their previous recommendations have been included within the sub objectives for SA 12.</p> <p>The consultee does not concur with the statement made in the section of the report which relates to the residential site options (from paragraph 5.9 of the SA Report for Emerging Strategy Paper) because too much weight is being given to the issue of surface water runoff in relation to other sources of flood risk. The consultee states that fluvial flooding may have a greater impact, or at minimum equate to potential impacts from greenfield sites.</p> <p>The consultee considers that too much emphasis seems to have been placed on potential flood risk from surface water than other risk sources when appraising the potential sites for allocation. The consultee states that assumptions for the appraisal of sites should be updated as follows (SA objective 12):</p> <ul style="list-style-type: none"> • Sites that are entirely or mainly (i.e. >50%) on greenfield land that is within flood zones 3a or 3b or mainly on brownfield within flood zones 3a or 3b are likely to have a significant negative (--) effect. • Sites that are either entirely or mainly on greenfield outside of flood zones 3a and 3b, or that are entirely or mainly on brownfield outside flood zones 3a or 3b are likely to have a minor negative (-) effect. 	<p>Comment noted.</p> <p>In relation to the residential site options, while paragraph 5.9 of the SA Report for Emerging Strategy Paper refers to impacts of developing greenfield or brownfield land on flood risk it also states <i>"if any of those sites (within flood zone 3) are to be allocated in the Local Plan Review it will be necessary to direct built development to those areas of the sites that are outside of flood zone 3 and incorporate appropriate mitigation measures such as Sustainable Drainage Systems (SuDS)"</i>. All sites have been appraised based on the area of the site that is within Flood Zone 3a and 3b. The assumptions which have been used to achieve a consistent approach to the appraisal of site options are presented in Appendix 4 of the SA Report for Emerging Strategy Paper and this report. The appraisal of SA objective 12 therefore takes into account land that is located within these higher risk flood areas <u>as well as</u> whether it is greenfield or brownfield land. As such fluvial flood risk has been considered as part of the SA.</p> <p>The above points considered the SA assumptions have been updated in this iteration of the SA Report to better reflect the consultee's comment. Changes to the SA assumptions are shown in underlined text. The appraisal of all sites has been updated in line with the change to this SA assumption.</p> <p>This SA report is reflective of the potential green infrastructure to be incorporated as part of sustainable layouts through an appropriate approach where it is included in the Local Plan</p>

Consultee	Representation relating to	Comment	SA Team Response
		<ul style="list-style-type: none"> Sites that are on brownfield land outside of flood zones 3a and 3b are likely to have a negligible (0) effect. <p>In relation to the Stroud Valleys the consultee states that provision of appropriate sustainable layouts has the potential to deliver benefits for green infrastructure in this area and should be identified in relation to SA objective 12.</p> <p>As part of the proposed monitoring indicators the consultee states that any permissions granted contrary to the advice of the Lead Local Flood Authority who are the statutory consultee on surface water discharges should be included.</p>	<p>document. The mini-vision for Stroud Valleys was appraised in the SA Report for the Emerging Strategy Paper as it has been presented in the Emerging Strategy Paper which does not contain explicit reference to sustainable layouts or green infrastructure for this area. The Draft Local Plan does not update the mini-vision for this area to reflect this issue and as such the appraisal does not include reference to this. SA objective 7 which relates to biodiversity considers where there are opportunities for green infrastructure provision and where green infrastructure might be lost to new development. To avoid a duplication of effects which are recorded any potential impacts on green infrastructure assets have not been considered as part of the appraisal work for site options undertaken for SA objective 12.</p> <p>The proposed monitoring framework has been updated in this SA Report to include an indicator relating to any permissions granted contrary to the advice of the Lead Local Flood Authority.</p>
Kingswood Parish Council	SA rep 3 – approach of appraisal in relation to education; appraisal of options for emerging growth strategy; reasons included for selection of potential sites for development	<p>The consultee states that the use of SA Objective 17: economic growth as the indicator for access to education and to base scoring solely on access to existing facilities is inappropriate. It is stated that the issue of capacity and opportunities for expansion should inform the appraisal. This has been related to the consideration of the options for the emerging growth strategy for the Local Plan.</p> <p>The consultee queries whether or not the SA report has taken account of the inclusion of up to 20 dwellings adjoining Tier 1 to 3 settlements as set out in the Emerging Growth Strategy in section 4.2 of the Emerging Strategy Paper. The consultee considers that this element of the Emerging Growth Strategy could have impacts which have not been identified through the SA Report.</p>	<p>The SA is a strategic, high-level process that is required to assess all options in the same level of detail. Evidence base information which is considered proportionate and available across the entirety or majority of the District has been used to inform the appraisal process. Gloucestershire County Council recently published the School Places Strategy 2018-2023. This information has been used to update the baseline for the SA process and has informed the SA findings. Considering the sensitivity of school capacity data it has not been possible to appraisal this issue at an individual site level. Furthermore, access to opportunities for education and educational attainment are strongly linked to economic performance and growth in a given area. It is therefore considered appropriate to address the issue of education through SA objective 17 which is to <i>“To allow for sustainable economic growth within environmental limits and innovation, an educated/skilled workforce and support the long term competitiveness of the District”</i> and includes the sub</p>

Consultee	Representation relating to	Comment	SA Team Response
		<p>The consultee also states there is an inconsistency in the appraisal of option 2 for the growth strategy in relation to SA Objective 6 ('access to services') (at page 201 of the SA Appendix). The consultee suggests that benefits identified for Wotton-under-Edge through the wider distribution proposed in option 2 "<i>despite the lack of development proposed in the town</i>" are not appropriate.</p> <p>The consultee queries reasons for selecting the site options at Kingswood ('KIN A' and 'KIN B') in comparison to the reasons for rejecting other sites at Tier 3a or 3b settlements where different views of the overall strategy are said to be provided for sites such as for 'FRA B'.</p> <p>The consultee comments on the suitability of sites PS38 and PS39 to be considered for allocation. It is stated that the site assessment process through the SALA, supported by the evidence base and SA report, provides a logic for indicating these locations as 'preferred' against other options. It is stated however that further evidence is required to demonstrate that the options are acceptable. Capacity at Kingswood Primary School and the solution to education infrastructure as well as other community facilities is highlighted and the uncertain minor positive effect identified in relation to SA objective 17 for both sites is contested. The differing appraisal of the sites in relation to SA objective 10: air quality and SA objective 16: employment is also contested.</p>	<p>objective "<i>Does the Plan promote access to education facilities for residents?</i>".</p> <p>The Emerging Growth Strategy states that "<i>small and medium sized sites (up to 20 dwellings) immediately adjoining settlement development limits at Tier 1- 3 settlements will be allowed to meet specific identified local development needs (i.e. exception sites for first time buyers, self build and custom build housing, rural exception sites), subject to being able to overcome environmental constraints.</i>" The sustainability effects of the Emerging Growth Strategy are summarised from paragraph 6.35 (with more detail provided in Table A6.1 in Appendix 6) of the SA Report for the Emerging Strategy Paper, with a summary provided in Appendix 6 of this SA Report. These effects are reflective of all growth which would be supported through the Emerging Growth Strategy.</p> <p>The appraisal of option 2 for the growth strategy in relation to SA objective 6 (access to services) takes into account potential benefits to Wotton-under-Edge, as this location is supported for 200 homes through this option. Option 2 would deliver the highest number of new homes at Wotton-under-Edge when compared to the other options put forward. As such the identification of the potential for improving the viability of local services through this option at the settlements which are outside of the tier 1 settlements is considered to be appropriate.</p> <p>Although presented in the SA Report for the Emerging Strategy, Appendix 7 (and updated in Appendix 8 of this SA Report) sets out the Council's reasons for selecting or rejecting site options, which include wider planning considerations, and not just the SA findings. The reasons for rejecting broad location FRA B include "<i>the scale of development proposed and location of this site would not accord with the emerging strategy of allocating development at the main tier 1 towns and at two new settlements, together with modest allocations at tier 2 settlements and lesser allocations at tier 3a settlements nearest to Stroud and Wotton-under-Edge.</i>" Therefore, fit with the</p>

Consultee	Representation relating to	Comment	SA Team Response
			<p>emerging strategy is a key reason for its rejection. The reasons for selecting KIN A and KIN B (which have been taken forward as KIN005 which formed part of PS38 and as KIN010 which forms part of PS39) include “<i>The site is considered suitable and available for the scale and type of development as set out in the emerging strategy</i>”. The sites KIN A and KIN B would provide more modest levels of growth than the sites at FRA B given that up to 50 homes were considered at the KIN A/KIN B locations and 80 homes considered for site FRA B.</p> <p>All site options considered as part of the Emerging Strategy Paper and the Draft Local Plan have been appraised in line with the SA assumptions presented in Appendix 4 of the SA report for the Emerging Strategy paper and represented in Appendix 4 of this SA Report. This has ensured a consistent approach to the appraisal work. The data sources used and any explanation relating to their use is also included in the SA assumptions table in Appendix 4. The site appraisal matrices for each site option considered in Appendix 5 (in the SA Report for the Emerging Strategy Paper and this SA Report also) provide justification for the potential effects identified in relation to each SA objective (based on the more detailed assumptions and explanation in Appendix 4).</p> <p>Schools capacity data was not available at the time and therefore was not considered in relation to the sites appraised in the November 2018 SA report. Both sites referred to by the consultee (PS38 and PS39) are within 800m of a primary school and therefore a minor positive effect has been recorded. The uncertainty attached to the effects for SA objective 17 for both sites reflect the potential for capacity issues at the education facility in question.</p> <p>The effects identified for sites in relation to air quality (SA objective 10) have been informed by findings of the Council in relation to SALA transport accessibility scoring. This assessment work was undertaken by Gloucester County Council on behalf of the Council and considered accessibility to town/district/local</p>

Consultee	Representation relating to	Comment	SA Team Response
			<p>centres, employment sites and services and facilities that people may be required to access on a regular basis. Sites were assessed in terms of accessibility to 14 such features by walking, by car and by bus (including walking journey time to the relevant bus stop). Site PS38 was assessed by the County Council as performing more poorly than site PS39 in relation to access to a principal/other town centre by bus or by walking; a key employment site by bus or by walking; a bank/building society by bus or by walking; a GP surgery by bus or by walking; a leisure centre by bus or by walking; a major supermarket by bus or by walking; and a post office by bus or by walking. It is therefore expected that the development of site PS38 would be likely to result in an increased requirement to travel by private car on a more regular basis than if site PS39 was to be developed. Therefore, site PS38 was identified as having a significant negative effect and PS39 a negligible effect on SA objective 10 in the SA Report for the Emerging Strategy Paper.</p> <p>Furthermore site PS39 has been identified as containing an existing employment use which could be lost to new development. As such a significant negative effect (as part of an overall mixed minor positive and significant negative effect) has been recorded in relation to SA objective 16: employment for this site, whereas site PS38 is identified as having a minor positive effect because it is located within 600m of key employment sites but not at a Tier 1 or Tier 2 settlement.</p>
NDA and Magnox Limited	SA rep 4 – general comment on the SA findings and specific support for the findings in relation to site BER013	The consultee states that the Issues and Options document detailed four alternative patterns for future growth and in relation to this the SA of the options concluded that Option 1 performs slightly better overall. The consultee is supportive of a policy approach that would provide context in relation to the on-going decommissioning process on the nuclear licensed site, as well as employment uses and employment related training and education uses for the site. The consultee does not provide any further comment in relation to the	Comment noted.

Consultee	Representation relating to	Comment	SA Team Response
		<p>specific findings of the SA in this regard and whether or not they are expressly supportive of or in dispute of them.</p> <p>The consultee is, however, supportive of the approach to and conclusions of the SA report in relation to the sites considered as part of the Emerging Strategy Paper. The consultee highlights their particular support for the findings of the SA in relation to employment site BER013 which has been identified as having some positive effects on some of the social and economic objectives.</p>	
Robert Hitchins Ltd	SA rep 5 -	<p>The consultee noted that the four options included in Issues and Options have been subject to a Sustainability Appraisal against 17 sustainability objectives but makes no further comment at this point in relation to any points of support or contention with the findings.</p> <p>The consultee contests the moving of Painswick from a tier 3 settlement to a tier 2 settlement in the settlement hierarchy. The commentary at paragraph 6.87 of the SA report is referenced in that Painswick has <i>"high sensitivity to employment or residential development."</i> Reference is also made to the SA commentary which relates to the position of the AONB and national and international biodiversity designations in the plan area. The consultee instead seeks to promote Whitminster to a tier 2 settlement in the emerging Local Plan document.</p> <p>The consultee also questions the appraisal of site STO016 stating that the appraisal findings should be considerate of the presence of site SA2 which is allocated through the current Local Plan. The consultee is ultimately supportive of the potential allocation of site PS19 which is included in the Emerging Strategy Paper as an altered boundary of site STO016. It is stated that the site should be scored more favourably given that development would be made</p>	<p>The SA report has not informed the setting out of changes for the settlement hierarchy. No alternatives have been considered for the approach in the Emerging Strategy Paper and the Draft Local Plan and therefore no further appraisal work was undertaken. As explained in paragraph 3.7 of the SA Report for the Emerging Strategy Paper, changes to the settlement hierarchy reflect changes on the ground and were identified by the Council through a detailed review of settlement roles and function, which responded to concerns raised through the Issues and Options consultation. For example, through an increased or reduced level of provision of services and facilities or transport infrastructure. Changes in the settlement hierarchy ultimately reflect the findings of the 2018 Settlement Role and Function Study Update.</p> <p>For clarification, paragraph 6.87 of the SA report for the Emerging Strategy Paper reads <i>"areas around the settlements of Brimscombe and Thrupp, Minchinhampton, Nailsworth, Kingswood, Stonehouse, Cam, Berkeley, Newtown and Sharpness and Painswick have been identified as having high sensitivity to employment or residential development."</i> It is not to be inferred that all land around Painswick is sensitive to new development.</p>

Consultee	Representation relating to	Comment	SA Team Response
		<p>up to its southern edge with consideration for this strategic site.</p> <p>The consultee contends that site STO006 should have been appraised for residential use and not mixed use development. As such the SA findings are therefore objected to. The previous submission of an outline planning application for the site for up to 90 dwellings including infrastructure, ancillary facilities, open space and landscaping and construction of new vehicular access have been referred to by the consultee. The consultee has also highlighted that the site was included in the 2017 SHLAA as having potential for up to 70 dwellings.</p> <p>The consultee has also referred to the findings of the SA report in relation to site CAM008 which is included as a potential site (PS21) in the Emerging Strategy Paper. The site is promoted by the consultee and the SA findings in relation to potential impacts on biodiversity, air quality, landscape and townscape with regard for other sites at Cam are highlighted. Similar comments have been included in relation to site WHI001 and WHI005 with regards to the findings of the SA report potentially supporting the allocation of the site. The findings of the SA report for site WHI001 and WHI005 have however been disputed in relation to air quality. The findings of the SA report for site WHI005 are also disputed in relation to water quality.</p> <p>The response also contains commentary on site WHI007 which the consultee is promoting for mixed uses. The comment is in agreement with the appraisal of the site through the SA report for mixed use. Impacts identified in relation to the site in terms of landscape, air and water quality and efficient use of land are disagreed with by the consultee.</p>	<p>The findings for the site options in this SA Report (Appendix 5) have been updated to reflect the allocations in the adopted Local Plan, including site SA2.</p> <p>Site STO006 has been appraised for mixed use in line with the list of alternatives which are considered reasonable by the Council. While Appendix 3 of the 2017 SHLAA identified the site as having potential for up to 70 dwellings, the site appraised through the SA report was considered for 90 dwellings as part of a mixed use development, as advised by the Council and reflective of the recent planning history of the site.</p> <p>Sites are not identified for allocation at this stage in the Local Plan process and decisions relating to potential inclusion or rejection for allocation will be taken by the Council during the later stages of the Local Plan preparation as informed by a number of decision making criteria. This will include but not be limited to the findings of the SA report. Decision making by the Council will be reported upon at later stages of the SA report.</p> <p>In terms of the disagreement with SA findings for sites WHI001, WHI005 and WHI007, all site options considered as part of the Draft Plan have been appraised in line with the updated SA assumptions presented in Appendix 4 of this SA Report. This has ensured a consistent approach to appraisal. The data sources used and any explanation relating to their use is also included in the SA assumptions table in Appendix 4. The site appraisal matrices in Appendix 5 provide justification for the potential effects identified in relation to each SA objective (based on the more detailed assumptions and explanation in Appendix 4).</p>

Consultee	Representation relating to	Comment	SA Team Response
Robert Hitchins Ltd and Persimmon Homes Severn Valley	SA rep 6 - sustainability effects relating sites PS24	Site PS24 comprises CAM013, CAM025 and CAM026 and is being promoted by the developers. The positive effects identified through the SA report for the Emerging Strategy Paper for these sites in relation to a number of issues including housing provision, landscape, employment, services and facilities have been highlighted by the developers.	Comment noted.
Persimmon Homes	SA rep 7 – consideration of hybrid growth strategy and promotion site in Kingswood	<p>The consultee generally agrees with the findings of the SA report in relation to the sustainability of the hybrid approach to a growth strategy in the district. The variable options which might be used to achieve this hybrid approach should be tested as part of the SA.</p> <p>The consultee highlights the findings of the SA report in relation to the vision for the Wotton-under-Edge Cluster citing the minor positive effects in relation to SA objectives 3, 5, 6, 8, 9, 10, 14, 16 and 17. The consultee also highlights the SA findings for the individual site P38 which it is promoting within Kingswood in the Wotton-under-Edge Cluster in support of the allocation of this site which contains land which is being promoted.</p>	<p>The appraisal of four different approaches to delivering the growth strategy has been presented as part of the SA Report for the Emerging Strategy Paper as well as in Appendix 3 of this SA Report. These were concentrated development adjacent to the main settlements (option 1), wider distribution (option 2), dispersal across the District (option 3) and the inclusion of a significant growth point (option 4). The SA Report recommended that a hybrid option would be worth considering. The Emerging Strategy Paper then took forward a hybrid approach to the Emerging Growth Strategy. The SA is required to test alternatives which are considered reasonable and the SA work should be proportionate to the plan. It is not considered reasonable to test all variable approaches to a hybrid approach considering the high number of options this is likely to involve.</p> <p>Reference to the SA findings in support of the consultee’s promoted site is noted.</p>
Charterhouse Strategic Land	SA rep 8 – site at Painswick being promoted; appraisal queried in relation to settlement hierarchy	The consultee has referred to the SA findings for the options considered for the approaches to managing development proposals on the edges of towns and villages. The consultee disagreed with the approach to continue with existing settlement development limits and the comment submitted is in agreement with the commentary that option 2 <i>"may benefit housing and economy objectives if residential and commercial developments are able to come forward in wider locations"</i>	<p>Comment noted.</p> <p>The effects recorded for potential sites considered as part of the Emerging Strategy Paper and the Draft Plan are based on the SA assumptions presented in Appendix 4 of this SA Report to achieve a consistent approach to appraisal across a high number of sites. SA objective 16: employment is related to the proximity of sites to different tiers of settlements. As explained in the table in Appendix 4 <i>"The new evidence in relation to changes in tier of settlements was only presented in the Emerging Strategy Paper. As such it was considered appropriate"</i></p>

Consultee	Representation relating to	Comment	SA Team Response
		<p><i>where it can be established that there would not be harm as a result."</i></p> <p>The land north of Painswick centre is being promoted by the consultee through the representation in question. For each of the Painswick sites (PAI001, 002, etc.) the consultee contests that the sites are assessed highly negatively against SA objective 16: employment on the basis that the site is not within a Tier 1 or Tier 2 settlement. This is stated to be incorrect as Painswick is identified in the Emerging Strategy Paper as a Tier 2 settlement. The comment also states that there is no ranking or specific recommendation arising from the SA which identifies a preference for proposed allocation. From here the consultee goes on to highlight that SA report states the Sustainability Appraisal findings are not the only factor to consider when selecting site options and the reasons for deciding which sites to allocate will need to be recorded in the full SA.</p>	<p><i>to consider these changes in relation to the appraisal of the potential sites only."</i> The new settlement hierarchy has informed an update to the SA assumptions as detailed by underlined text in Appendix 4 of this SA Report. Appraisal of all sites considered have been revisited to reflect this change to the assumptions.</p> <p>In relation to the consultee's desire to see ranking of sites through the SA process, as paragraph 2.12 of the SA Report for the Emerging Strategy Paper stated that <i>"there will often be an equal number of positive or negative effects identified for each option [in this case site], such that it is not possible to 'rank' them based on sustainability performance in order to select an option"</i>. As such it is not the SA Report's purpose to present a ranking of sites or recommendation of sites to be included in the final Local Plan document. The SA report instead forms part of the evidence base for the decision making process in terms of the selection of options from all reasonable alternatives considered. Reasons for taking forward or rejecting sites as potential sites for development as well as policy options in the Emerging Strategy Paper have been provided in Appendix 7 of the SA report which accompanied that paper as well as Appendix 9 of this SA Report.</p>
Hamfallow Parish Council	SA rep 9 – sustainability effects relating to Berkeley Cluster and specific sites in that area	<p>The consultee refers to the findings for the Vision for the Berkeley Cluster at page 101 and compares them with the findings for sites PS33, PS34, PS35 and PS36 in Table 6.8 in the SA report for the Emerging Strategy Paper. The consultee states that in relation to air quality (SA objective 10) the minor negative effect in relation to PS33 and PS35 and significant negative effect in relation to PS34 and PS36 identified are accurate but that the effects recorded in relation to the Berkeley Cluster at page 101 are not reflective of the likely impacts. It is also stated that the consultee disagrees with the employment and economic growth (SA objectives 16 and 17) findings which were scored as significantly positive.</p>	<p>The findings in relation to the Vision for the Berkeley Cluster at page 101 of the SA Report for the Emerging Strategy Paper are reflective of the "aspirational and high level nature" of this portion of the Local Plan document (please see paragraph 6.51 of the SA report and the summary of findings presented in Appendix 6 of this SA Report). The SA findings identify the effect that the vision set out for the cluster may have on developers and decision makers in the area. Conversely the appraisal findings for the sites PS33, PS34, PS35 and PS36 in Table 6.8 of the SA Report for the Emerging Strategy Paper (a summary of which is represented in Appendix of this SA Report) represent the effects of developing the specific land in question without consideration for any potential mitigation. Therefore,</p>

Consultee	Representation relating to	Comment	SA Team Response
			<p>the findings for individual sites are necessarily different from the findings for the overall vision for the Berkeley cluster.</p> <p>The site appraisal has been guided by the SA assumptions presented in Appendix 4 (in the SA Report for the Emerging Strategy Paper and this SA Report also), to achieve consistency across the high number of sites appraised. The detailed matrices for sites PS33, PS34, PS35 and PS36, which Table 6.8 of the SA Report for the Emerging Strategy Paper presents a summary of, are presented in Appendix 6 of that SA Report. A summary of those findings are also presented in Appendix 6 of this SA Report. These matrices should be referred to for justification of the scores assigned to each of the individual sites considered.</p>
Linden Homes	SA rep 10 – site being promoted at Kingswood and comments regarding SA findings for emerging strategy	<p>The consultee is promoting land in Kingswood for development. The land corresponds with site KIN001 which was appraised as a reasonable alternative in the SA report for the Emerging Strategy Paper. The site was not included as a potential site for development in the Emerging Strategy Paper but only as an alternative site. The consultee has not directly referenced the findings of the SA report in relation to this site but states that the site is sustainable in the following ways:</p> <ul style="list-style-type: none"> • It would provide 'good' accessibility to local services and facilities. In relation to this, Kingswood should have tier 2 settlement status ; • The landscape assessment of the land as being of high landscape sensitivity is contested and in any case impacts on the landscape can be mitigated. <p>The consultee agrees with the conclusion of the SA that a hybrid option in relation to the future growth strategy should be considered. However, the individual findings of the SA in relation to the more favourable performance of option 1 when compared to options 2 to 4 for SA objectives 7, 9, 11, 12 and 13 are disagreed with by the consultee. The consultee considers that performance</p>	<p>The SA report for the Emerging Strategy Paper included an appraisal of site KIN001. All site options appraised through the SA process have been considered against the SA framework and associated SA assumptions (Table 2.2 and Appendix 4 respectively in this SA Report) which allow for a consistent approach to the appraisal work. As such the accessibility of the site to services and facilities has been considered through SA objective 6 for which the site scored a negligible effect as a third tier settlement. It is for the Council to decide if Kingswood should have tier 2 status. If further evidence becomes available to reclassify the settlement as a tier 2 settlement as the consultee has suggested, this would be considered as part of the allocation of sites through the Local Plan process as well as the SA. The site has been assessed as having high/medium sensitivity to development in the Landscape Sensitivity Assessment and this has informed the findings of the SA report in relation to landscape (SA objective 8). The site has therefore been appraised as having a significant negative effect in relation to this SA objective.</p> <p>In relation to the appraisal of the options for the growth strategy for Stroud, the appraisal of the options put forward in a 'policy-off' scenario has been undertaken given that environmental</p>

Consultee	Representation relating to	Comment	SA Team Response
		<p>against the environmental SA objectives will be similar for all four of the growth strategy options.</p>	<p>policies have not been worked up yet. Mitigation against any environmental protection policies which the Council works up will be considered at later iterations of SA report. The appraisal of individual potential sites for growth is considered separately. Cumulative effects of the individual potential sites for development and policies in the Emerging Strategy Plan have been presented from paragraph 6.91 of the SA Report and is also included in this SA Report at Appendix 6.</p>
<p>Strutt & Parker and BNP Paribas Real Estate on behalf of redacted</p>	<p>SA rep 11 – sustainability findings for the emerging strategy and promotion of land by Hardwicke</p>	<p>The consultee states that they support the aims of the emerging strategy in seeking to deliver a clear economic strategy to support sustainable economic growth. The SA report for the Emerging Strategy Paper is referred to in that it highlights that the District’s strong strategic transport links along the M5 corridor should be made use of appropriately to facilitate future economic growth.</p> <p>The consultee states that it is agreed that option 1 for the Emerging Growth Strategy performs strongly in terms of its sustainability merits as is presented in the SA report for the Emerging Strategy Paper. It is stated that this option is the most likely to help generate developer and public funding to help support infrastructure improvements at Junction 12 of the M5.</p> <p>The client also seeks to promote an additional piece of land on the eastern side of the B4008 Gloucester Road which is in relatively close proximity to the employment sites Quedgeley East (PS31) and South of M5 / J12, (PS32) both of which are in Hackwicke and have been appraised as part of the SA report. The scores of these sites and sites HDF007 and HDF008 are referred to in the representation and it is stated that the consultee’s site would be ‘highly likely’ to score similarly to these sites.</p>	<p>Comment noted.</p> <p>It should be noted that while option 1 was highlighted as performing strongly against the SA objectives the SA report at paragraph 4.33 of the SA Report for the Emerging Strategy Paper concluded that <i>“it may be worth considering a hybrid option which most resembles Option 1: Concentrated development, but perhaps including growth at one or two growth points and/or one or two of the smaller towns and larger villages as well.”</i></p> <p>The Council has considered all known sites which are considered to be deliverable or developable reasonable alternatives as part of the Local Plan preparation and the supporting SA process. Should the Council decide that the land being promoted by the consultee is a reasonable alternative it will be subject to SA in future iterations of the SA report.</p> <p>While comparisons to other nearby sites may give an indication of the likely SA effects of the site, effects may not directly correspond. All site options appraised through the SA process have been considered against the SA framework and associated SA assumptions (Table 2.2 and Appendix 4 of the SA Report for the Emerging Strategy Paper and this SA Report respectively) which allow for a consistent approach to the appraisal work. Any new reasonable alternative site would need to be appraised against the same SA assumptions.</p>

Consultee	Representation relating to	Comment	SA Team Response
Redacted	SA rep 12 – sustainability effects for sites in Dursley	<p>The consultee disputes the capacity for 175 new homes across sites DUR010 to DUR013 which has been included in the SA report. It is stated that the SALA suggests that 138 new homes can be accommodated at the site.</p> <p>The consultee also contests the statement in the SA report that those sites appraised are not to be proposed for development. It is contested that site PS29 is suggested as a potential site for development in the Local Plan. The consultee disagrees with the identification of this site for potential development.</p> <p>The consultee highlights the SA scoping report’s reference to the importance of the landscape to the future growth of tourism in the district. It is stated that this has been ignored when appraising site PS29.</p>	<p>The SA report for the Emerging Strategy Paper appraised site DUR010 as having potential to accommodate 50 homes and site DUR013 as having potential to accommodate 100 homes. The total number of homes accommodated across these sites is therefore 150 new homes and is based on site capacity work undertaken by the Council. Should further work relating to site capacity indicate that the capacity for either site needs to be updated, the sites will be appraised taking the new information into consideration.</p> <p>All sites appraised as part of the SA Report for the Emerging Strategy Paper constitute reasonable alternative site options for allocation as part of the Local Plan. The Emerging Strategy Paper contained only potential sites for development and as such no sites are allocated through this document but merely presented as options which the Council are considering to take forward to support for development. Site PS29 comprises part of the potential sites considered for eventual allocation in through the Local Plan once it is adopted.</p> <p>All site options appraised through the SA process have been considered against the SA framework and associated SA assumptions (Table 2.2 and Appendix 4 of the SA Report for the Emerging Strategy Paper and this SA Report respectively) which allow for a consistent approach to the appraisal work. SA objective 8 relates to the protection of the landscape in that it seeks to appraise elements of the Local Plan document in terms of seeking <i>“To conserve and enhance the local character and distinctiveness of landscapes and townscapes and provide sustainable access to countryside in the District.”</i> SA objective 17 relates to sustainable economic growth and contains the sub-objective <i>“Does the Plan maintain and enhance the economic vitality and vibrancy of the District’s town centres and tourist attractions?”</i></p>

Table A1.3: Consultation responses to comments on the Draft Plan SA Report

Consultee	Representation relating to	Summary of comment made	SA Team Response
Rep ref no 105 (redacted individual comment)	SA rep 1 – consideration of sustainability effects identified through the SA Report in relation to site option in Local Plan	<p>The consultee objects to the allocation of a site at Wisloe Green (PS37 - New settlement at Wisloe, Wisloe (Slimbridge)). The consultee highlights that the SA Report identifies significant positive effects for the site in relation objectives SA1: housing, SA16: employment and SA17: economic growth and minor positive effects in relation to objectives SA5: vibrant communities, SA6: services and facilities and SA14: climate change. It is also highlighted that minor and significant negative effects are recorded for the site in relation to objectives SA11: water quality, SA12: flooding and SA13: efficient land use and mixed effects recorded in relation to objectives SA2: health and SA10: air quality. The consultee presents these findings in support of their objection to the allocation. The consultee also queries the negligible effect recorded in relation to objective SA4: crime stating that an increase in housing numbers could result in increased occurrence of crime in the area.</p>	<p>Comment noted in relation to SA findings.</p> <p>The SA Report forms only part of the evidence base for the selection of site options and policy options for inclusion in the Local Plan. The Council’s reasons for selecting and rejecting of sites have been presented in Table A8.2 of the SA Report for the Draft Local Plan and is presented in Table A9.2 of this iteration of the SA Report.</p> <p>In relation to SA objective 4: crime, the specific siting of development in a given area is considered unlikely to affect the rate of crime. In order for the SA to be consistent in appraising hundreds of site options, it cannot account for anecdotal evidence relating to a specific site that the consultee has made reference to, instead the assumptions regarding significant effects have been applied as set out in Appendix 4 of this iteration of the SA Report.</p>
Rep ref no 131 (Highways England)	SA rep 2 – consideration of effects on capacity of the road network	<p>The consultee concurs with the SA in relation to the potential for the main function of the strategic road network (SRN) (to facilitate long-distance movement of goods and people) to be undermined by the spatial strategy of providing major employment opportunities and housing along the A38/M5 corridor, which may result in increased localised trips on the SRN.</p> <p>The consultee concurs with the SA Report in relation to the potential for new residents to be left without immediate access to a wide range of existing services and facilities during the early stages of development at the Sharpness Garden Village allocation. The consultee suggests that the new settlement is likely to be heavily reliant on public car use as, contrary to Draft Policy PS36, they are not currently aware of any commitments by the</p>	<p>Comment noted in relation to SA findings regarding potential impacts on the SRN.</p> <p>The appraisal of various site options has been informed by information made available from the Council. As further details are made available on the specific infrastructure provisions to be made at site allocation PS36 (including sustainable transport links and school facilities), these will be taken into consideration and any implications for the potential sustainability effects reported upon. Please see Appendix 7 for the updated appraisal of this site.</p>

Consultee	Representation relating to	Summary of comment made	SA Team Response
		<p>relevant rail and bus operators regarding new infrastructure and services.</p> <p>The consultee states that the Sharpness Vale promoter prospectus provided in the Draft Plan supporting evidence does not make any reference to the delivery of secondary school at Sharpness, which is contrary to statements made in the Draft Plan document and SA Report, which state that the new settlement will include a primary school and secondary school. The consultee would therefore welcome clarity on this matter as lack of a secondary school at the new settlement would have further implications in relation to the wider transport network.</p>	
Rep ref no 159 (redacted individual comment)	SA rep 3 – consideration of sustainability effects identified through the SA Report in relation to site option in Local Plan	<p>The consultee objects to the inclusion in the Draft Local Plan of site PS41. In support of this objection the consultee has referred to the findings of the SA Report. The consultee has highlighted the potential adverse impacts of protecting water sources given that the site lies within a water safeguarding zone meaning a significant negative effect has been identified in relation to SA objective 11: water quality. The identification of the site as lying within an area which has been assessed as having medium/high sensitivity to development through the Landscape Sensitivity Assessment and therefore an uncertain significant negative effect in relation to SA objective 8: landscapes/townscapes has also been highlighted. The location of the site on greenfield land which could result in increased levels of impermeable surfaces in the District (which has been reflected through the minor negative effect in relation to SA objective 12: flooding) has also been highlighted and the consultee also states that the site is within flood zone 3a.</p>	<p>The majority of the potential effects the consultee has referred to from the SA Report are not in question. However, the SA Report does not refer to the site lying within Flood Zone 3a and the closest area of land within the flood zone lies approximately 380m to the east of the site.</p> <p>It should be noted that the SA Report forms only part of the evidence base for the selection of site options and policy options for inclusion in the Local Plan. It is a separate component of the plan preparation process. Other evidence base work has also been used to inform the decision-making for the Local Plan. The Council's reasons for selecting and rejecting of sites have been presented in Table A8.2 of the SA Report for the Draft Local Plan and is presented in Table A9.2 of this iteration of the SA Report.</p>
Rep ref no 162	SA rep 4 – consideration of	The consultee objects to the amount of development which is proposed to be delivered at Berkeley and	The SA Report has identified a number of negative effects in relation to Policy EI2a as described from paragraph 4.186 of the

Consultee	Representation relating to	Summary of comment made	SA Team Response
(redacted individual comment)	sustainability effects identified through the SA Report in relation to site option in Local Plan	Sharpness. It is stated in the representation that the former Berkeley Power Station site is being promoted for training and employment opportunities. The comment received specifically cites the findings of the SA Report in relation to Policy EI2a: Former Berkeley Power Station and the potential impacts on biodiversity/geodiversity (SA7), historic environment (SA9), air quality (SA10), flooding (SA12) and climate change (SA14). The consultee agrees with the negative effects identified in relation to biodiversity/geodiversity, historic environment and flooding. It is contested that the negative effects relating to air quality and climate change have been discounted due to the potential employment opportunities for the site.	SA Report for the Draft Local Plan and in this iteration of the SA Report from paragraph 4.205. While the SA Report for the Draft Local Plan identified that employment opportunities at the site could include renewable and low carbon energy generation which are likely to have benefits in terms of moving to more carbon neutral energy production locally, the potential negative effects were not discounted. Instead the SA Report recorded a mixed overall (minor positive and minor negative) effect in relation to climate change (SA14) given the more isolated location of the site which may result in employees having to travel by car to this location. This policy has not been updated from the adopted Local Plan through the Local Plan Review and therefore the supporting text of the policy in the adopted Local Plan will remain the same. The supporting text of the policy identifies that site may provide opportunities for research facilities related to the renewable energy.
Rep ref no 162 (redacted individual comment)	SA rep 5 - consideration of sustainability effects identified through the SA Report in relation to site option in Local Plan and presentation of SA findings	<p>The consultee objects to the development proposed for Wisloe Green. It is assumed that the consultee is making reference to site allocation (PS37 - New settlement at Wisloe, Wisloe (Slimbridge)), however there is no direct reference to the allocation number. The consultee highlights the negative and mixed effects identified through the SA Report in relation to air quality (SA10), water quality (SA11), flooding (SA12) and efficient land use (SA13).</p> <p>The consultee also states that SA findings for the site have been 'lost' due to the size of the document and the amount of information presented.</p>	<p>It acknowledged that the site performs less favourably in relation to some of the SA objectives in comparison to some of the site options considered. The SA Report forms only part of the evidence base for the selection of site options and policy options for inclusion in the Local Plan. The Council's reasons for selecting and rejecting of sites have been presented in Table A8.2 of the SA Report for the Draft Local Plan and is presented in Table A9.2 of this iteration of the SA Report.</p> <p>As required by the SEA Regulations², the SA Report for the Draft Local Plan presents the findings for all reasonable alternative sites and policy options considered by the Council at the Issues (Autumn 2017), Preferred Strategy (Autumn 2018) and Draft Plan (Autumn 2019) stages. This iteration of the SA Report also includes the updated findings for the Publication version of Local Plan. As such there is a requirement to present a large amount of information in a single document. The SA Report has included</p>

² Regulation 12 (2) of the SEA Regulations; The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232).

Consultee	Representation relating to	Summary of comment made	SA Team Response
			<p>the cumulative effects of the Draft Local Plan (including the effects of the new settlement at Wisloe) in Table 6.1 of the 2019 SA Report and Table 6.1 of this iteration of the SA Report. This table includes the sustainability effects of all site allocations (including site PS37). The SA Report at each stage of the plan making process has been presented to be as easy to interpret as possible with Table 1.1 in each iteration of the report setting out the SEA Regulations and where these have been addressed, and Chapter 1 of the report summarising what is contained in each chapter and appendix.</p>
<p>Rep ref no 191 (redacted individual comment)</p>	<p>SA rep 6 – contesting whether site option meets the SA sub-objectives and the policy context set out through the PPP review in the SA Report</p>	<p>The consultee objects to the allocation proposed (site PS37) in the area of Slimbridge and Cam (which would include the large scale development at Wisloe). The consultee highlights a number of the SA sub-questions and queries whether the allocation at Slimbridge is in line with these. The comment also refers to the requirements of the NPPF which have been highlighted through the SA Report in relation to transport issues and queries whether the allocation at Slimbridge is in line with those policy requirements.</p>	<p>The policy requirements of the NPPF highlighted in the SA Report form part of the review of plans, policies and programmes (PPP) which forms part of the sustainability context for undertaking the SA. In effect it acts to inform the preparation of the SA Framework (Table 2.2 in the SA Report for the Draft Local Plan and Table 2.2 of this iteration of the SA Report) which is used to appraise the various site and policy options considered for the Local Plan. The SA sub-objectives sit below each of the SA objectives in the SA Framework as a means of coming to decisions on the likely effects of these options. For the site options considered, a number of SA assumptions have been agreed so that a consistent approach to appraisal can be achieved. These are presented in Appendix 4 of the SA Report for the Draft Local and Appendix 4 of this iteration of the SA Report. The sites considered for allocation through the Local Plan at Slimbridge and Cam have been appraised using these assumptions. The Draft Local Plan set out proposed sites for allocation at the north of Cam and at Slimbridge (PS24, PS25 and PS37) all of which have been appraised through the SA Report in line with the SA assumptions for the SA Framework.</p> <p>It should be noted that the SA Report forms only part of the evidence base for the selection of site options and policy options for inclusion in the Local Plan. The Council’s reasons for selecting and rejecting of sites have been presented in Table A8.2 of the</p>

Consultee	Representation relating to	Summary of comment made	SA Team Response
			SA Report for the Draft Local Plan and is presented in Table A9.2 of this iteration of the SA Report.
Rep ref no 201 (redacted individual comment)	SA rep 7 – contesting whether site option meets the SA sub-objectives and the policy context set out through the PPP review in the SA Report	The consultee objects to the development proposed in the area of Slimbridge and Cam (including 1,500 homes at Wisloe and further homes at Cam). The consultee highlights a number of the SA sub-questions and queries whether the development in question is in line with these. The comment also refers to the requirements of the NPPF which have been highlighted through the Plans, Policies and Programmes (PPP) review in the SA Report in relation to transport issues and queries whether the development in question is in line with those policy requirements.	<p>The SA sub-objectives sit below each of the SA objectives in the SA Framework (Table 2.2 in the Local for the Draft Local Plan and Table 2.2 of this iteration of the SA Report) as a means of coming to decisions on the likely effects of policy and site options on each SA objective. For the site options appraisal, a number of SA assumptions have been agreed, so that a consistent approach to identifying minor and significant effects can be achieved. These assumptions take into account the sub-objectives for each SA objective, and are presented in Appendix 4 of the SA Report for the Draft Local and Appendix 4 of this iteration of the SA Report. The sites considered for allocation through the Local Plan at Slimbridge and Cam have been appraised using these assumptions. The Draft Local Plan set out a proposed site (PS37) for the allocation of 1,500 dwellings as a new garden village at Wisloe. The site has been appraised through the SA Report in line with the SA assumptions for the SA Framework.</p> <p>The review of international and national Plans, Policies and Programmes undertaken as part of the SA Report forms the sustainability context for the SA. In effect it acts to inform the preparation of the SA Framework (Table 2.2 in the Local for the Draft Local Plan and Table 2.2 of this iteration of the SA Report) which is used to appraise the various site and policy options considered for the Local Plan. In addition, the Local Plan must be in conformity with national policy (as set out in the NPPF), and this forms one of the tests of soundness at the Examination stage.</p> <p>It should be noted that the SA Report forms only part of the evidence base for the selection of site options and policy options for inclusion in the Local Plan. The Council’s reasons for selecting and rejecting of sites have been presented in Table A8.2 of the</p>

Consultee	Representation relating to	Summary of comment made	SA Team Response
			SA Report for the Draft Local Plan and is presented in Table A9.2 of this iteration of the SA Report.
Rep ref no 261 (Savills)	SA rep 8 – contesting SA findings for individual site option	<p>The consultee states that the land at Whaddon (site G2) should not be reserved simply to meet the growth needs of Gloucester City but should be allocated as a suitable and sustainable location for development. The appraisal of the site is contested in relation to the following areas:</p> <p>SA objective 2 (health): it is stated that the effect recorded should be significant positive and not significant positive/minor negative given that the 800m buffer applied for GPs is 'arbitrary'.</p> <p>SA objective 7 (biodiversity/geodiversity): it is stated that the effect recorded should be minor positive and not minor positive/minor negative as the nearby biodiversity site (Robin's Wood Hill Quarry SSSI) which the SA Report has identified as having potential to be negatively affected is unlikely to attract visitors and therefore is unlikely to be susceptible to recreational pressures.</p> <p>SA objective 8 (landscape): it is stated that the effect recorded should be minor positive and not minor negative as the site has been independently evaluated by inspectors / panels and these evaluations did not identify landscape as a potential constraint.</p> <p>SA objective 9 (historic environment): it is stated that the effect recorded should be uncertain and not minor negative. The comment acknowledges that the wider area within which site G2 lies <u>could</u> impact upon the setting of nearby identified heritage assets but that it is not possible to confirm whether development would cause harm to the setting of off-site heritage assets and the magnitude of that harm.</p>	<p>The site has been appraised alongside other site options considered for allocation in line with the SA assumptions to assure consistency between the appraisal of sites. These are presented in Appendix 4 of the SA Report for the Draft Local Plan and Appendix 4 of this SA Report.</p> <p>The SA assumptions have included buffering distances to services and facilities and various constraints (e.g. biodiversity sites) to establish the sustainability credentials of sites when compared against each other. The Institute of Highways and Transportation categorises walking distances³ depending upon location and purpose of the trip, and 'desirable', 'acceptable', and 'preferred maximum'. For town centres where the highest concentration of services and facilities are often located the preferred maximum has been established to be 800m. This information has been used to inform the buffering distance used for access to services and facilities. Therefore, it is considered appropriate to record a minor negative effect in combination with a minor positive effect for this site option in relation to SA objective 2.</p> <p>In relation to SA objective 7 the potential for recreational pressures on a biodiversity site is only one of a number of different types of adverse impacts nearby development could have on that site which are assumed to give rise to a negative effect as set out in the SA assumptions. Additional detrimental impacts may relate for example to the fragmentation of existing connectivity between that site and other surrounding areas of ecological importance and the impacts of light, air or noise pollution.</p> <p>The minor negative effect recorded in relation to SA objective 8 reflects the relatively close proximity of the site (within 500m) to</p>

³ Institution of Highways and Transport (2000) Guidelines for Providing for Journeys on Foot

Consultee	Representation relating to	Summary of comment made	SA Team Response
		<p>SA objective 10 (air quality): the mixed significant negative and significant positive effect recorded is contested. It is stated that the accessibility score that the effect recorded is based on is not viewable for consultees and that the site is accessible to nearby services and facilities and by sustainable modes of travel.</p> <p>SA objective 12 (flooding): the consultee states that it is an error that the SA Reports concludes that a large proportion of the site lies within flood zone 3a and 3b. Instead the consultee states that development of the site could help to improve local flood risk issues. It is therefore concluded by the consultee that the significant effect recorded is incorrect and should be a significant positive effect.</p> <p>SA objective 13 (land use): it is stated that the significant negative effect is incorrect and should instead be a significant positive effect. The approach of considering the development of greenfield as inefficient is contested and it is stated that the use of the land for housing instead of agriculture would have social, economic and environmental benefits instead of simply those relating to food production.</p>	<p>the AONB. The individual evaluations the consultee makes reference to are not available for all sites and therefore for the strategic level of appraisal to be consistent in appraising hundreds of site options, it cannot account for site specific evidence. Instead the assumptions regarding significant effects have been applied as set out in Appendix 4 of this iteration of the SA Report.</p> <p>The effects recorded for sites in relation to SA objective 9 reflect the findings of the Council's heritage impact assessment work. The site has been rated as '2' (i.e. potential for impacts on heritage interest (moderate sensitivity)). Impacts identified for the site through this work relate to the adjoining Grade II Yew Tree farmhouse and Grade II* St Margaret's Church and churchyard as well as the 'historic landscape' of Gloucester's rural fringe. The minor negative effect recorded reflects these sensitivities.</p> <p>The negative effect recorded in relation to SA objective 12 for the site reflects the presence of Daniels Brook within the site and the extent of the areas of flood zone 2 and 3 surrounding it. The information presented by the consultee in relation to the potential to alleviate flood risk as development occurs is not available for all site options and therefore, as noted previously, its consideration could result in inconsistency within the SA.</p> <p>Finally, in relation to SA objective 13 the site is almost entirely greenfield and comprises mostly Grade 3 agricultural soils. The use of this site for development is seen as inefficient use of land when compared to available brownfield sites. It is in contrast with the NPPF's support for making use of previously-developed or 'brownfield' land as much use as possible as well as the protection of valued soils.</p>
Rep ref no 264	SA rep 9 - consideration of site option contained in the	The consultee contests the proposed development at Sharpness (site PS36). It is stated that "sensible and sustainable levels of development in the Berkeley and Sharpness area" would be supported. It is also stated	Land within site PS36 has been appraised using the location and boundaries provided by the Council at the various stages of the planning making process. The appraisal of this site is set out in Table 5.1 of the SA for the Draft Plan and Appendix 7 of this SA

Consultee	Representation relating to	Summary of comment made	SA Team Response
(redacted individual comment)	Draft Local Plan, whether the options for the strategy have been considered through the SA and whether consultation comments have been appropriately considered.	<p>that the original four positions for the development strategy described in the original Issues and Options consultation and which had been subject to sustainability appraisal and other studies were replaced in the Emerging Strategy with a 'hybrid' strategy. This is described as a fifth option by the consultee. It is stated that this option was not assessed with the same level of detailed scrutiny as the other options. The comment states that the infrastructure development required to support growth over the plan period will have its own sustainability and environmental effects and these should be incorporated into the SA Report. In relation to the Transport Assessment the consultee states that this document should be updated to include the hybrid option and its findings and their implications should then be incorporated into the SA Report.</p> <p>Overall the consultee states that there is too much reliance on the findings of the SA to justify the direction of travel of the Emerging Strategy and that the suite of other existing and planned evidence base documents could better identify effects if these were to be distilled.</p> <p>The consultee further argues in their covering letter that that there has been a lack of response from the Council to the previous consultations.</p>	<p>Report. The appraisal of the most up to date boundary of site PS36 is presented in Appendix 7 of the SA Report for the Draft Local Plan. The site has been appraised alongside the other site options considered for allocation in line with the SA assumptions presented in Appendix 4 of the SA Report for the Draft Local Plan and Appendix 4 of this SA Report. to ensure consistency between the appraisal of sites.</p> <p>The appraisal of the four different development strategy options from the Issues and Options paper (as updated by the Council in March 2018⁴ was presented in Chapter 4 and Appendix 3 of the 2018 SA Report for the Emerging Strategy Paper (and re-presented in Appendix 3 of the 2019 SA Report for Draft Local Plan). The options were: concentrated development adjacent to the main settlements (option 1); wider distribution (option 2); dispersal across the District (option 3); and the inclusion of a significant growth point (option 4). The findings of the appraisal of these four options were originally presented to Council officers in early August 2018, so that the findings could inform the policy approaches included within the Emerging Strategy Paper. This work took into account the findings of the Council's draft version of the Strategy Options Transport Discussion Paper (July 2018). The SA recommended that a hybrid option would be worth considering, which most resembles Option 1: Concentrated development, but perhaps including growth at one or two growth points (i.e. Option 4) and/or one or two of the smaller towns and larger villages as well (i.e. Option 2). This was a recommendation from the SA based on the SA findings of the four options, which concluded that Option 1 performed slightly better overall in terms of potential positive effects and slightly fewer negative effects. However, there are elements of the other three options that also performed well. In particular, concentrating all the new growth at the three potential growth points could have fewer negative environmental impacts than Options 2 and 3, and would have most of the same significant</p>

⁴ Local Plan Review: Developing a preferred strategy (revised March 2018): <https://www.stroud.gov.uk/media/738491/1-local-plan-review-developing-a-preferred-strategy.pdf>

Consultee	Representation relating to	Summary of comment made	SA Team Response
			<p>positive effects as Option 1 for provision of housing, employment opportunities, access to services, health and social inclusion due to the creation of new, mixed-use communities. Option 2 with a slightly wider distribution than Option 1 could have benefits in terms of access to services and employment opportunities for some of the other larger towns and villages in the District. The hybrid option as updated for Draft Local Plan was appraised as part of the Additional Housing Options consultation in October 2020. A summary of these findings are included in Appendix 8 of this SA Report.</p> <p>The SA has appraised any infrastructure proposals and requirements set out in the Local Plan versions to date, for example through our appraisal of the Employment and Infrastructure policies in Chapter 4 and the site allocation policies in Chapter 5. However, it is recognised that specific infrastructure schemes have not been proposed in the Draft Local Plan, and the site allocation infrastructure requirements are only set out in a general way. All of the site allocation policies acknowledge that "A development brief incorporating an indicative masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner". The further infrastructure proposals set out in the Pre-Submission Plan for the individual site allocations, have been subject to SA.</p> <p>The SA Report has been informed by other evidence base documents produced by the Council at the time of its production. This approach has been taken to ensure that the appraisal of site options reflect the on the ground realities. This includes heritage impact assessment work, landscape sensitivity work and this iteration of the SA Report also reflects the HRA Report. However, it should be noted that the SA Report forms only part of the evidence base for the selection of site options and policy options for inclusion in the Local Plan. The Council's reasons for selecting and rejecting site options have been presented in Table A8.2 of</p>

Consultee	Representation relating to	Summary of comment made	SA Team Response
			<p>the SA Report for the Draft Local Plan and is presented in Table A9.2 of this iteration of the SA Report.</p> <p>At each stage of the plan-making process, the SA Report has presented a summary of consultation responses relating to the previous SA Report and how they have been addressed within the current version of the SA Report, and all of these consultation response tables are presented in Appendix 1 of this SA Report.</p>
<p>Rep ref no 267</p> <p>BaSRAG (Berkeley and Sharpness Residents Action Group)</p>	<p>SA rep 10 - consideration of site option contained in the Draft Local Plan, whether the options for the strategy have been considered through the SA and whether consultation comments have been appropriately considered.</p>	<p>The consultee contests that site PS36 is not suitable for the scale of development being proposed. It is stated that “sensible and sustainable levels of development in the Berkeley and Sharpness area” would be supported. It is also stated that the original four positions for the development strategy described in the original Issues and Options consultation which had been subject to sustainability appraisal and other studies were replaced in the Emerging Strategy with a ‘hybrid’ strategy. The consultee also states that this hybrid option was not assessed to the same level of detailed scrutiny. The consultee further argues that there has been a lack of response from the Council to the previous consultations.</p>	<p>See response in the row above in relation to Rep ref no. 264</p>
<p>Rep ref no 285</p> <p>Historic England</p>	<p>SA rep 11 – consideration of findings of the SA</p>	<p>The consultee states that the SA and SALA Heritage Impact Appraisals highlight a number of contentious proposed allocations and that it is of importance for the Submission version of the plan to include expectations for developers to minimise adverse impacts in the body of the document. It is also highlighted that the SA emphasises that a significant number of heritage assets within the District are ‘at risk’. The comment queries how the plan might positively address such matters.</p>	<p>Comment noted and no implications for SA findings.</p> <p>The next iteration of the SA will consider the extent to which the Pre-Submission Plan has addressed Historic England’s comments.</p>

Consultee	Representation relating to	Summary of comment made	SA Team Response
Rep ref no 307 Cllr Haydn Jones	SA rep 12 – consideration of SA Report and findings in relation to development strategy and site option	<p>The consultee contests the approach of the Draft Local Plan in relation to a number of issues. The SA Report and its findings have been referred to in relation to the development strategy and the Wisloe site option (site PS37). It is stated that the development strategy should incorporate a dispersal approach as it was favoured in previous consultations. The comment refers to the PPP review in the SA Report which highlights the NPPF requirement that allocation of sites should include at least 10% of the sites of smaller size (1ha or less). It is stated that this policy requirement has not been met through the Draft Local Plan.</p> <p>In relation to the site at Wisloe (PS37) the consultee has highlighted that the site contains Grade 2 agricultural land. It is stated that the SA Report highlights the need to protect best and most versatile agricultural land. The consultee has also highlighted that the SA Report requires plan options to 'enhance the beauty of landscapes' and contests that the site in question would not do this.</p> <p>The consultee has also referred to the recommendations included in the SA Report for the Draft Local Plan from page 133. It is stated that Wisloe site would not meet the recommendations of avoiding the provision residential development in close proximity to unsuitable neighbouring uses given the location of the motorway, the Gloucester/Bristol railway and the main gas pipe.</p>	<p>The PPP review in Chapter 3 of this SA Report includes reference to the NPPF requirement for at least 10% of the sites allocated for housing through a local authority's plan to be 1ha or smaller. The NPPF requirements includes sites on the brownfield register. By including sites on the brownfield register the Council meets this target.</p> <p>The SA Report considers the loss of agricultural soils and impacts on landscapes when appraising the site options, in line with the SA assumptions in Appendix 4 of the SA Report for the Draft Local Plan (please see SA objective 13) and Appendix 4 of this SA Report. The sites have been appraised using this approach to allow for a consistency of approach between the various options.</p> <p>Agricultural soils have been considered through SA objective 12. The site contains Grade 3 agricultural soils, which results in an uncertain significant negative effect. However, as the site is large (providing more than 600 homes) and is mostly greenfield, an overall significant negative effect has been recorded in relation to this SA objective as shown in Appendix 7 on page 608 of the SA Report for the Draft Local Plan. Potential impacts on landscape character have been considered through SA objective 9. As the site is not covered by the Landscape Sensitivity Assessment and is not within or within 500m of the AONB an uncertain effect has been recorded in relation to this SA objective.</p> <p>The recommendations included in the SA Report for the Draft Local Plan are for the Council to consider alongside other evidence base documents to inform the decision making for the Local Plan. This version of the SA Report has noted where SA recommendations have been addressed or not in the Pre-Submission Plan in Chapter 6.</p>
Rep ref 314	SA rep 13 - consideration of sustainability effects identified	The consultee has identified that the SA Report reports on significant negative effects relating to flooding (SA objective 12) and efficient land use (SA objective 13) for site PS33 but accepts that "houses need to be built	Comments noted where the SA findings have been used to support the consultee's argument. The consultee has queried whether the SA can assume that transport infrastructure improvements will be delivered at site PS36, and the effects

Consultee	Representation relating to	Summary of comment made	SA Team Response
(redacted individual comment)	through the SA Report in relation to site option in Local Plan	<p>somewhere” in the District. In relation to site PS35 the consultee states that there is a need for a secondary school and that the County Council should buy back the school rather than build houses on it. The consultee has also stated that for site PS34 significant negative effects have been identified in relation to biodiversity (SA objective 7), air quality (SA objective 10) and flooding (SA objective 12). The consultee, however, concludes that they have no objection to development of the site if the building of the houses can complement the area as a working dock.</p> <p>The comment also contests the allocation of greenfield land at site PS36 for several reasons. In relation to the SA Report it is queried whether the provision of the rail station and improvements to the roads can realistically be delivered.</p> <p>The promotion of the former Berkeley Power Station site for training and employment opportunities is queried through the comment. The SA’s findings in relation to significant negative effects on biodiversity/geodiversity (SA objective 7) and historic environment (SA objective 9) and an uncertain effects on landscape/townscape (SA objective 8) are cited in relation to this issue. Effects relating to air quality (SA objective 10) and climate change (SA objective 14) are also cited but it stated that the effects in relation to these two issues are discounted by the SA.</p>	<p>identified relating to air quality (SA objective 10) and climate change (SA objective 14) for the former Berkeley Power Station site.</p> <p>The site options have been appraised in the SA Report using the SA assumptions presented in Appendix 4 of the SA Report for the Draft Local and Appendix 4 of this iteration of the SA Report to ensure a consistent approach to the appraisal of hundreds of site options. The SA Report forms only part of the evidence base for the selection of site options and policy options for inclusion in the Local Plan. The Council’s reasons for selecting and rejecting of sites have been presented in Table A8.2 of the SA Report for the Draft Local Plan and is presented in Table A9.2 of this iteration of the SA Report.</p> <p>In relation to the appraisal of site PS36, the site allocation text in the Draft Local Plan indicates that a new railway station and bus services are to be provided at the new settlement at this location. It is understood that this will be a requirement which developers of the site will need to commit to before planning is granted for the site so it is considered reasonable for the SA findings to reflect this type of provision at the site. The site promoters are still exploring potential options for the site. As more detailed requirements are provided in the site allocation policy in the next version of the Plan, the appraisal will be updated to reflect them.</p> <p>The consultee has not quoted which part of the Draft Local Plan they are referring to in relation their comments on the former Berkeley Power Station site. However, it is assumed that they are referring to the appraisal of Policy EI2a which sets out the approach for this land. The SA Report has identified a number of negative effects in relation to this policy as described from paragraph 4.186 of the SA Report for the Draft Local Plan and in this iteration of the SA Report from paragraph 4.206. While the SA Report for the Draft Local Plan identified that employment opportunities at the site could include renewable and low carbon energy generation which are likely to have benefits in terms of</p>

Consultee	Representation relating to	Summary of comment made	SA Team Response
			moving to more carbon neutral energy production locally, the potential negative effects were not discounted. Instead the SA Report recorded a mixed overall (minor positive and minor negative) effect in relation to climate change (SA objective 14) with consideration for the more isolated location of the site which may result in employees having to travel by car to this location. This policy has not been updated from the adopted Local Plan through the Local Plan Review and therefore the supporting text of the policy in the adopted Local Plan will remain the same. The supporting text of the policy identifies that site may provide opportunities for research facilities related to renewable energy. A minor negative effect was identified for this policy in relation to air quality (SA objective 10) which also reflects its more isolated location.
Rep ref 343 (redacted individual comment)	SA rep 14 - consideration of site option contained in the Draft Local Plan in relation to SA findings	The consultee considers site PS36 not to be suitable for the scale of development being proposed and suggests that the location is unsustainable. The development of the new settlement is disputed on a number of grounds including exacerbation of existing commuting patterns to workplaces outside of the locality and travel to areas of higher level services and facilities. Impacts on landscape character as well as protected habitats of the Severn Estuary are also highlighted as a concern. Effects relating to flood risk (which may be exacerbated by climate change) are also cited in dispute of this potential site allocation. The findings of the SA Report are highlighted in support of the objection to the allocation.	Comment noted and no implications for SA findings.
Rep ref 347 RPS on behalf of Redrow Homes Ltd	SA rep 15 - consideration of site options contained in the Draft Local Plan in relation to SA findings	The consultee is promoting site option G1 Land South of Hardwicke for development. Site option PS37 at Wisloe is suggested through the representation to form an extension to Cam and/or Slimbridge and it is argued that it should be promoted as such. Reference is made to the SA Report which defines the site as being at a Tier 3b	All site options (including sites PS37 and G1) have been appraised in line with the assumptions set out in Appendix 4 of the SA Report for the Draft Local Plan and Appendix 4 of this SA Report. The assumptions have been agreed so that a consistent approach to appraisal can be achieved. The appraisal of site option G1 presented by the consultee diverges from the SA assumptions used to appraise all other site options considered by the Council for allocation. This approach introduces

Consultee	Representation relating to	Summary of comment made	SA Team Response
		<p>settlement (Slimbridge) in respect of criterion SA6 (Services and Facilities).</p> <p>The representation also highlights the findings of the SA Report for site option G1, stating that it performs favourably in this regard. The consultee has presented a revised appraisal of the site to emphasise this point. The effects recorded in relation to SA objective 2: health and wellbeing, SA objective 3: social inclusion, SA objective 7: biodiversity and geodiversity, SA objective 8: landscape and townscape, SA objective 9: historic environment, SA objective 10: air quality, and SA objective 12: flooding have all been revised to be more favourable by the consultee.</p>	<p>inconsistencies to the appraisal and would undermine the methodology used for SA.</p> <p>For site PS37 the SA has identified the land included for allocation lies in close proximity to a tier 3b settlement (Slimbridge). The proximity of the site to this settlement has been set out in relation to SA objective 6: services and facilities given that the proximity of the settlement is likely to provide residents with access to existing service provision at this location. In line with the SA assumptions a minor positive effect has been recorded in relation to SA objective 6. The appraisal of the site and SA Report also reflects the draft site allocation for site PS37 in the Draft Local Plan, which sets out that the allocation is to be delivered as a new settlement in line with the Garden City Principles.</p>
Rep ref 359 (redacted individual comment)	SA rep 16 – consideration of site and policy options contained in the Draft Local Plan in relation to SA findings	<p>The consultee has queried whether the Sharpness allocation aligns with the SA findings quoting "...in selecting site options to allocate, there would be a need to avoid settlements where negative environmental effects on biodiversity/geodiversity, landscape/townscape, historic environment, water quality and flooding are more likely."</p> <p>The summary of findings of the SA for the site options has also been cited in dispute of the potential impacts the plan may have in terms of landscape, flood risk and biodiversity. In relation to flood risk it is queried whether detailed flood risk assessment has been undertaken to support the suitability of the Sharpness site allocation. The consultee has referred to the recommendations of the SA in relation proposals for Sharpness. The findings of the SA have also been referred to in relation to education and health.</p>	<p>Comment noted and no implications for SA findings.</p> <p>The recommendations included in the SA Report for the Draft Local Plan are for the Council to consider alongside other evidence base documents to inform the decision making for the Local Plan. This version of the SA Report has noted where SA recommendations have been addressed or not in the Pre-Submission Plan in Chapter 6. It should be noted that the SA Report forms only part of the evidence base for the selection of site options and policy options for inclusion in the Local Plan. The Council's reasons for selecting and rejecting of sites have been presented in Table A8.2 of the SA Report for the Draft Local Plan and is presented in Table A9.2 of this iteration of the SA Report. In relation to Flood Risk, the Council has commissioned the Strategic Flood Risk Assessment which contains a detailed assessment of flood risk at the Sharpness site (PS36) in Appendix O.</p>
Rep ref 385	SA rep 17 – consideration of strategic growth	The consultee states that for the mini vision for the Wotton Cluster a negative performance against the SA housing objective, as well as the services and facilities	The appraisal of Policy CP2 has been undertaken at a strategic level that is considered to be proportionate and appropriate reflecting the level of detail in the policy. The appraisal took into

Consultee	Representation relating to	Summary of comment made	SA Team Response
Barton Willmore on behalf of Vistry Homes (currently trading as Linden Homes)	and development locations, plan mini vision and site option in relation to SA findings	<p>and vibrant communities objectives should be recorded given the more constrained development strategy for the Wotton area. Furthermore, the appraisal of Policy CP2 should reflect the negative relationship with social objectives for the Wotton Cluster.</p> <p>It is stated that there is no assessment of alternatives in relation to the 'mini -visions' for the Cluster Areas in the SA of the Draft Local Plan. It is argued that the SA took a very broad brush approach to the impacts across the District as a whole, contesting the effects recorded in relation to Option 1 and Option 2 for the distribution of development in the Emerging Strategy document. The consultee argues that the appraisal overlooked different spatial impacts of these strategic growth options.</p> <p>In relation to the difference of effects for the options for the growth options relating to biodiversity (SA objective 7); landscape/townscape (SA objective 9); water quality (SA objective 11); flooding (SA objective 12); and efficient use of land (SA objective 13) it is argued by the consultee that 'more dispersed' locations that avoid areas of high landscape / biodiversity value and land at risk of flooding, could be selected through Options 2 and 4, thus arriving at the same effects recorded for Option 1 (i.e. +/- or ?). Alternatively, the same potential negative assumptions could apply to land around the largest towns (i.e. Option 1) – the point being that the same unbiased assumptions should apply to all options, unless specific, identified sites are known to have particular constraints. It is also argued in the comment that the selection of suitable sites (regardless of whether it is close to a town or in a more rural location), coupled with the application of the Plan's environmental protection policies which could help to mitigate potential adverse impacts will ensure that performance against these 4 environmental SA objectives is more favourable.</p>	<p>account all of the strategic growth and development locations set out in CP2 in combination when identifying effects for the whole district (rather than highlighting specific effects at individual settlements, which are covered through the appraisal of mini-visions for the parish clusters and the individual site options). The appraisal of Policy CP2 did highlight some specific effects at individual settlements in relation to particular SA objectives (e.g. settlements within AONB, flood zones 2 and 3, or near to European designated sites) The SA (see from paragraph 4.53 of the SA Report for the Draft Local Plan) has identified potential for mixed minor positive and minor negative effects for Policy CP2 in relation to SA objective 3: social inclusion and SA objective 5: vibrant communities, as providing high amounts of growth at Tier 1 settlements and in large new settlements is likely to help address issues of access for much of the local population. The SA also states that at rural locations, access to service provision is likely to be lower, although the smaller amount of development to be provided at these locations could help support longer term rural service provision. This latter explanation in relation to smaller settlements accounts for the minor negative effect recorded in combination with the minor positive effect. This iteration of the SA Report presents the appraisal of Policy CP2 for paragraph 4.63.</p> <p>The mini visions were taken from the adopted Local Plan and updated to incorporate the views of Parish Council representatives in each Parish Cluster group at the Emerging Strategy stage. No reasonable alternatives were identified by the Council or Parish Councils, but the revised versions of the mini visions constitute reasonable alternatives to those set out in the adopted Local Plan. The appraisal of the mini visions for each area of the plan has been included in the SA Report of the Draft Local Plan from paragraph 4.20. As explained in this text the aspirational and high-level nature of the mini visions means that they are expected to have mostly minor positive or negligible effects in relation to the SA objectives. It is expected that policies in the Local Plan will carry most weight when planning</p>

Consultee	Representation relating to	Summary of comment made	SA Team Response
		<p>The comment also highlights that another point of difference between the performance of the November 2018 growth options is the assumption that concentration of development is better for climate change / air quality. It is suggested that this does not take account of the impacts of very little growth in the Wotton cluster which in the context of smaller household size could lead to declining support and potential loss of quality/quantity/diversity of services and facilities affecting the vitality of Wotton-under-Edge.</p> <p>The comment also contains reference to the individual appraisal of site KIN001 specifically in relation to the appraisal of SA objective 8: landscape/townscape objective and SA objective 9: historic environment. In relation to SA objective 8 a Landscape and Visual Study for the site and potential mitigation solutions are referred to, to dispute the findings included in the SA. In dispute of the findings for SA objective 9 the consultee states that the SALA heritage impact study concludes that there is 'some impact on heritage constraints' in respect of the Wotton Road site but these are not significant heritage constraints. In relation to SA objective 2 it is disputed that the site contains a public right of way which would provide access to the wider PROW network.</p>	<p>decisions are being made by officers. This iteration of the SA Report presents the appraisal of the mini visions for paragraph 4.20.</p> <p>The SA has recorded a higher number of positive effects for Option 1 in relation to SA objectives 7, 8, 9, 11, 12 and 13 due to the smaller number of larger sites that would be developed under this option. The SA notes the relative performance between the options (see paragraph 1.33 of Appendix 3 in the SA Report for the Draft Local Plan), which states that Option 1 "performs slightly better overall in terms of potential positive effects and slightly fewer negative effects ... however, there are elements of the other three options that also perform well". As stated in paragraph 1.27 of Appendix of the SA Report for the Draft Local Plan, Option 1 presents the opportunity to provide development in Stroud at a smaller number of larger sites many of which are well related to the larger settlements. This would result in much of the new development being located away from the more sensitive biodiversity and geodiversity sites and landscape designations. Given the historic pattern of development in the District, these are also the locations where opportunities for re-use of brownfield land are likely to be most prevalent. These locations also are less constrained by flood risk and water sensitivities. The SA does not dismiss the potential for adverse impacts to occur through this approach and negative effects have been recorded for Option 1 in relation to all SA objectives apart from SA objectives 4: crime, 10: air quality, 14: climate change and 15: waste. The SA of all four options has been undertaken without consider for any mitigation which might be achieved through development management policies. Taking an approach which considers the potential for mitigation through other planning policy would generally result in the sustainability effects identified for all options being the same.</p> <p>With regards to the potential impacts of the growth options from November 2018 in relation to climate change / air quality the SA has identified that providing most development at concentrated locations by the larger settlements would provide improved</p>

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			<p>access to services and facilities as well as sustainable transport links which is likely to result in a large number of new and existing residents having reduced need to travel by private vehicles. Providing most development at concentrated locations may also help to secure contributions towards infrastructure that can promote renewable energy generation.</p> <p>In relation to the appraisal of site KIN001 for SA objective 8: landscape/townscape and SA objective 9: historic environment, all SA objectives have been appraised in line with the SA assumptions set out in Appendix 4 of the SA Report for the Draft Local Plan. This is to ensure consistency of appraisal between the various site options. While the consultee has provided additional information in relation to the site's suitability in terms of landscape and potential mitigation of effects which might result, the site lies on land which has been assessed through the Stroud District Landscape Sensitivity Assessment as having high/medium sensitivity to housing development. In line with the SA assumptions applied to all other site options and to avoid considering information not available for other site options, the site has been recorded as having a significant negative effect in relation to SA objective 8. The consultee also states that the heritage impact study considers there could be 'some impact on heritage constraints' in respect of the Wotton Road site but these are not significant heritage constraints. The SA has not recorded a significant negative effect in relation to SA objective 9 for the site option. A minor negative effect has been recorded and given the conclusions of the heritage impact study for 'some impact' this is considered appropriate. The GIS data supporting the study does not indicate that site KIN001 contains a PROW or is within 400m of a feature of this nature. The mixed minor negative and minor positive effect recorded for the site in relation to SA objective 2: health is therefore considered to be consistent with the effects recorded for other site options.</p>
Rep ref 401	SA rep 18 – consideration of	The consultee has commented on the cumulative effects of the SA Report for Draft Local Plan (as reported in	Comment noted.

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Natural England	cumulative effects	<p>Chapter 6 of that SA Report) in relation to biodiversity/geodiversity (SA objective 7), landscape/townscape (SA objective 8) and land use (SA objective 13). Significant negative effects have been identified in combination with the potential for minor positive effects for these three SA objectives. The effects relate to impacts on the Severn Estuary SAC/SPA/Ramsar Site, Rodborough Common SAC and the Cotswold Beechwoods SAC, Stroud Valleys and the Cotswolds AONB and development of higher value soils and Natural England has cited these findings and welcomes further dialogue with the Council.</p>	
Rep ref 405 Stagecoach	SA rep 19 – consideration of public transport and access to services and facilities	<p>The consultee has made overarching representations on Draft Local Plan as well as site-specific representations on Strategic Allocations exceeding 500 units.</p> <p>It is stated by consultee that the evidence base that has been put forward with the Draft Plan, including the Draft Sustainability Appraisal, is welcomed to allow some clear scrutiny before the pre-submission version is consulted on.</p> <p>However, the consultee suggests that the SA draws too deeply on evidence in the Settlement Role and Function Study Update (SRFSU) relating to the categorisation of settlements. They suggest that in assessing the ease of access to wider-distributed services and facilities not provided within many smaller settlements, it is not clear how the existing and the potential usefulness and relevance of sustainable choices to meet day to day travel needs drives the evaluation of accessibility in the SRFSU, and then the SA. They state that a number of Tier 2 settlements that have been described as having good access to services and facilities should be described as “substantial villages” rather than “market towns”. Additionally, they express concerns over the widely divergent availability of public transport in these</p>	<p>The SA Report has made use of relevant evidence base documents available at the time of preparation to inform the appraisal of SA objectives for individual site and policy options where appropriate. It is not possible or considered necessary to undertake site visits to inform the SA of the Local Plan considering its strategic nature and the high number of site options considered (300+).</p> <p>The Settlement Role and Function Study Update (SRFSU) is considered a credible source of evidence which has been updated by the Council in May 2019. The settlement hierarchy work goes beyond considering only bus access which the consultee’s comments are most concerned with. The SRFSU presents an assessment of each settlement’s current role and function (as at 2018 or, in the case of the ‘Accessibility Matrix’ (Table 6 in the SRFSU), which looks at average drive-time and walking/bus journey times to nine key services and facilities across the county, as at 2016). Travel times in the SRFSU do not take account of variable traffic conditions, but the data does rely upon genuine bus timetables (as at 2016) and safe / realistic walking routes. While the Accessibility Matrix in the SRFSU forms an important part of the categorisation of settlements. The study looks more widely at assessing settlements including by looking at settlement size and population, levels of local or strategic</p>

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		<p>settlements, with only Nailsworth and Hunts Grove offering hourly or better bus services. They suggest that there are a number of Tier 3 settlements that have better access to public transport.</p> <p>The consultee suggests that the SA Report also draws too heavily on the outputs of the Strategic Assessment of Land Availability (SALA) to look at the relative merits of the specific development sites, rather than the broader case for settlements to grow in principle. They express concern that previously developed land within Stroud/Chalford Valley performs the best, despite the fact the level of service offered is no more than hourly, the service requires a steep uphill walk to access and the services present neither a choice of arrival nor departure times, or even of destination (service 64 only serves Stroud Town Centre). The consultee identifies that by contrast the extensions to Stonehouse and Cam/Draycott perform poorly because they fall outside the somewhat arbitrary 400m catchment of bus stops. The consultee suggests the assessors have given insufficient consideration to the committed delivery of bus stops and services that are to come forward in the area. Ultimately, they state that the author of the SA needs to use a methodology that could much more clearly differentiate between the existing and potential walking, cycling and public transport endowments of sites.</p> <p>For employment sites, the consultee suggests no attempt has been made to understand if a relevant public transport choice exists as the assessment was tied to bus stops rather than bus routes.</p> <p>The consultee states that the methodology takes a very different approach to assessing the two existing proposed new settlement sites at Sharpness (PS36) and Wisloe Green (PS37), to other potential options. They suggest this is inherently inconsistent methodology, as other</p>	<p>service provision and employment role. The SRFSU states that Tier 2 settlements are “relatively large settlements, some of which have a ‘strategic’ role in terms of providing services or facilities that serve a District-wide or wider-than-local catchment”. The assumptions which have been used to achieve a consistent approach to the appraisal of site options (see Appendix 4 of the SA Report for the Draft Local Plan) have drawn on this evidence (and evidence relating to all other tiers of settlements) and state that sites located at a second tier settlement will have a minor positive effect in relation to SA objective 6: services and facilities. While it may be argued by the consultee that a number of Tier 3 settlements that have better access to public transport, only SA objective 6: services and facilities and SA objective 16: employment opportunities have been informed on the findings presented in the SRFSU. SA objective 10: air quality which relates to the potential for the allocation of sites to reduce the need to travel in the District, is based on work undertaken by Gloucestershire County Council on behalf of Stroud District Council as part of the SALA relating to accessibility of town/district/local centres, employment sites and services and facilities that people may be required to access on a regular basis. Sites were assessed in terms of accessibility to 14 such features by walking, by car and by bus (including walking journey time to the relevant bus stop).</p> <p>All 300+ site options (including those taken forward for allocation and those not) were initially appraised without consideration of any infrastructure which might be provided on site (including that which might support sustainable travel in the area). The potential for sites to provide new bus stops and taking into account local topography (e.g. residents having to walk up steep inclines to access bus stops) was not able to be factored into this strategic level SA at this stage, given the large number of site options being appraised. The appraisal of all site options was presented in Appendix 5 of the SA Report for the Draft Local Plan and details of how these sites related to the</p>

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		<p>options have not been assessed on their potential to deliver substantial improvements to the sustainable transport endowment. PS21a North West Stonehouse, PS24 North West Cam, and G1 South of Hardwicke have demonstrable ability to help catalyse a step change in the availability of public transport not just relevant to the development, but the entire corridor served.</p> <p>The consultee suggests that the conclusions of the SA in relation to the proposed Sharpness allocation PS36 are now open to fundamental challenge as the Sharpness promoter has now accepted that neither a rail station and express bus routes is deliverable within the Plan period up to 2041.</p> <p>The consultee raises a concern that there is not a dedicated transport SA objective and suggest that this is part of the reason why the SA fails to consider transport-related issues sufficiently.</p> <p>The consultee raises a concern that the SA claims that the settlement at Wisloe would provide for less significant transport improvements claiming that no evidence is available to back up this statement.</p> <p>The consultee states that the SA report makes no reference in the "Key Challenges" section to the need to enhance and prioritise sustainable transport to provide relevant choices to high levels of car ownership, out-commuting and car-dependence.</p> <p>The consultee notes that para. 6.77 of the SA claims that development in the District will lead to an increase in the number of trips being made regularly to commute or meet other local needs. They suggest that evidence used to make these claims is outdated (e.g. 2011 Census data).</p>	<p>draft site allocations was presented in Table 5.1. This report presents is information in Appendix 5 and Table 5.1.</p> <p>The approach of the SA has not considered the viability of sites for development. This is for consideration as part of the decision-making process for the Local Plan undertaken separately. The Council's reasons for selection or rejection of site options in the Draft Local Plan is presented in Table A8.2 of Appendix 8 of the SA Report for that document. Please see also Appendix 9 of this report. The approach of the appraisal is also considered proportionate to that required.</p> <p>The appraisal of the allocation sites at Sharpness (PS36) and Wisloe Green (PS37) did factor in new bus stop provision because those site options that were selected for allocation were re-appraised taking into account the information set out in the draft site allocation policy in the Draft Local Plan. For these two site allocations, the policies state that these requirements will be made as development is delivered. It is acknowledged that if the promoter for site PS36 has indicated that neither a rail station and express bus routes can be delivered at the site, that the appraisal will need to be updated and the revised matrix for this site is presented in Appendix 7. The Strategic Site Allocation Policy for this site in the Pre-submission Draft Plan includes the delivery of a new railway station and enhancements to the Sharpness branch line which is reflected in the appraisal findings for the site.</p> <p>The statement in the SA Report for the Draft Local Plan that the settlement at Wisloe would provide for less significant transport improvements reflects the draft site allocations policy text in the Draft Local Plan. These highlight that site PS36 at Sharpness would provide a new rail station and rapid bus services to these nearest main settlements, while site PS37 at Wisloe would only provide walking and cycling connections to Cam and Dursley rail station and rapid bus services to the nearest main settlements. The site promoters are investigating the potential options for this. Therefore, site PS36 has scored more favourably than site</p>

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			<p>PS37 in relation to SA objective 10: air quality with a significant positive effect recorded for PS36 and a minor positive effect recorded for PS37.</p> <p>The SA Report has considered the sustainability implications of site and policy options relating to transport through SA objective 10: air quality (in terms of reducing the need to travel by car and promoting sustainable transport modes) and SA objective 14: climate change (also promoting sustainable transport modes). The assumptions for site options in relation to SA objective 10 reflect the findings of the SALA Transport Accessibility Assessment work undertaken by Gloucestershire County Council for Stroud District Council. As stated above, this considers the accessibility of sites to a number of receptors which gives an indication of the need for new residents to travel regularly from these locations. It is considered appropriate to consider these issues in tandem considering the close relationship between air pollution and vehicular travel.</p> <p>The SA Report has included amongst the key sustainability issues for the District "While a high proportion of residents in the District make use of alternative modes of transport such as cycling to commute, car ownership in the area is high, and there are serious congestion problems in key locations". The same table in the SA Report states that "The Local Plan Review presents the opportunity to incorporate support for the establishment of stronger sustainable transport links and the provision of new development at allocated sites where these links will be accessible. Furthermore, the policy position of Local Plan can be updated to reflect the evolved situation of the restoration of the canals in Stroud and progress with cycling and walking capital projects."</p> <p>The SA Report has presented the baseline evidence for the plan area based on the most up to date evidence available at the time of its preparation. The baseline evidence section has been updated at each iteration of the report. It is accepted that the 2011 Census data is now quite out of date, however, this is the</p>

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			<p>most of to date and complete dataset which is available for commuting patterns in the District. This issue has been highlighted in Chapter 2 of this SA Report which presents the difficulties encountered in the SA process and data limitations.</p>
<p>Rep ref 428 Barton Willmore on behalf of Redrow Homes Limited</p>	<p>SA rep 20 – consideration of strategic growth and development locations, plan mini vision and site option in relation to SA findings</p>	<p>The consultees states that Policy CP2 has not been appraised to appropriately account for the potential negative effects of the proposed development strategy for Whitminster in relation to social objectives. It is argued that the limited growth strategy for Whitminster should mean a negative performance in relation to the SA objective relating to housing, as well as the services and facilities and vibrant communities objectives would be expected. The consultee has also referred to the findings of the 2018 Settlement Study, which outlines the need and benefits of growth at Whitminster ‘to maintain diversity and demographic vitality’. It is also stated that there is no appraisal of alternative growth options at Whitminster through the SA.</p> <p>It is also argued in the comment that the appraisal of the Mini Vision for Severn Vale should be amended to highlight adverse impacts in relation to the SA housing objective, as well as the services and facilities and vibrant communities objectives considering the limited housing growth proposed in Whitminster.</p> <p>The consultee has also set out the findings of the SA in relation to the individual site at Whitminster (WHI010) which they are promoting. The findings do not appear to be contested but instead the consultee uses key points from the findings to support the case for the site’s allocation.</p>	<p>The appraisal of Policy CP2 has been undertaken at a strategic level that is considered to be proportionate and appropriate reflecting the level of detail in the policy. The appraisal took into account all of the strategic growth and development locations set out in CP2 in combination when identifying effects for the whole district (rather than identifying specific effects at individual settlements, which are covered through the appraisal of mini-visions for the parish clusters and the individual site options). The appraisal of Policy CP2 did highlight some specific effects at individual settlements in relation to particular SA objectives (e.g. settlements within AONB, flood zones 2 and 3, or near to European designated sites). The SA (see from paragraph 4.53 of the SA Report for the Draft Local Plan) has identified potential for mixed minor positive and minor negative effects for Policy CP2 in relation to SA objective 3: social inclusion and SA objective 5: vibrant communities as providing high amounts of growth at Tier 1 settlements and in large new settlements, is likely to help address issues of access for much of the local population. The SA also states that at rural locations, access to service provision is likely to be lower, although the smaller amount of development to be provided at these locations could help support longer term rural service provision. This latter explanation in relation to smaller settlements accounts for the minor negative effect recorded in combination with the minor positive effect. This iteration of the SA Report presents the appraisal of Policy CP2 at paragraph 4.63. The SA has also considered the effects of site allocations in terms of individual settlements in the plan area in Chapter 5.</p> <p>The mini visions were taken from the adopted Local Plan and updated to incorporate the views of Parish Council representatives in each Parish Cluster group at the Emerging</p>

Consultee	Representation relating to	Summary of comment made	SA Team Response
			<p>Strategy stage. No reasonable alternatives were identified by the Council or Parish Councils, but the revised versions of the mini visions constitute reasonable alternatives to those set out in the adopted Local Plan. The appraisal of the mini visions for each area of the plan has been included in the SA Report of the Draft Local Plan from paragraph 4.20. As explained in this text the aspirational and high-level nature of the mini visions means that they are expected to have mostly minor positive or negligible effects in relation to the SA objectives. Negligible effects for SA objectives 1, 3 and 5 were identified for the Severn Vale cluster, which includes Whitminster, due to the low number of housing allocated for this cluster. It is expected that policies in the Local Plan will carry most weight when planning decisions are being made by officers. This iteration of the SA Report presents the appraisal of the mini visions from paragraph 4.20.</p> <p>It should be noted that the SA Report forms only part of the evidence base for the selection of site options and policy options for inclusion in the Local Plan. It is a separate component of the plan preparation process. Other evidence base work (including the SALA work which the consultee has made reference to) has also been used to inform the decision-making for the Local Plan. The Council's reasons for selecting and rejecting of sites have been presented in Table A8.2 of the SA Report for the Draft Local Plan and is presented in Table A9.2 of this iteration of the SA Report.</p>
Rep ref 430 Boyer Planning on behalf of Redrow Homes	SA rep 21 – consideration of evidence in SA Report and consideration of SA findings in relation to site option	<p>The consultee contests the SA Report's approach to the consideration of school capacity data in relation to the draft site allocations in the Draft Local Plan. The uncertain minor positive effect recorded in relation to SA objective 17 (economic growth) for the Kingswood allocation (PS38) is also contested, considering that the capacity of the nearby schools has not been accounted for in the effect recorded.</p> <p>The comment also raises concern in relation to the appraisal of the site in terms of what development is to</p>	As the consultee has stated, the SA Report has considered the potential pressures on education facilities in Stroud from paragraph 5.32 of the report for the Draft Local Plan and paragraph 5.61 of this report. Instead of considering the potential pressures on specific schools resulting from the allocation of individual sites, the SA Report has included a commentary relating to potential pressures on schools at different settlements drawn from the Gloucestershire County

Consultee	Representation relating to	Summary of comment made	SA Team Response
		<p>be delivered. The community uses to be provided are not defined and strategic landscaping is also to be provided. The relatively small size of the site considered alongside the combination of site uses means that the consultee is concerned that the full quantum of development proposed (50 dwellings) cannot actually be achieved.</p> <p>The consultee also questions the potential sustainability of the new settlement to be delivered at Sharpness at site PS36. The comment highlights that the SA Report includes commentary that Sharpness is “not well related to existing services and facilities, town centres and important employment centres.” The commentary of the SA Report is also quoted where it is stated that “there is a possibility that residents will have inadequate access to services and facilities during the early stages of development, which may result in a need to travel further afield using private car trips”. In relation to this potential allocation the consultee recognises that the SA identifies the potential to off-set these significant negative effects by referring to requirement for the Garden City principles at the new development which could lead to significant positive effects. It is concluded by the consultee that this does not provide the necessary justification for the site’s inclusion within the plan at this stage.</p> <p>In relation to the site option the consultee also suggests that the potential to achieve sustainable patterns of development at this location is entirely dependent upon future public transport investment. The text of the SA Report for the Draft Local Plan is quoted stating that “the new settlement at Sharpness would provide significant new sustainable transport improvements (including a new rail station and rapid bus services)” and the consultee argues that no evidence is available in relation to the</p>	<p>Council’s School Places Strategy⁵. Data relating to the capacity pressures of individual schools has not been available at a site-specific level. With regards to the uncertain minor positive effect recorded for the allocation PS38 in relation to SA objective 17, which is based on the proximity of the site to education facilities, this is consistent with the appraisal of all site options, in line with the SA assumptions in Appendix 4 of the SA Report for the Draft Local Plan and for the Pre-submission Draft Local Plan. As the consultee acknowledges, the draft allocation text in the Draft Local Plan included the stipulation that the allocation is dependent on the satisfactory resolution of existing school capacity issues at Kingswood. Local Sites Allocation Policy PS38 South of Wickwar Road in the Pre-submission Draft Local does not include reference to school capacity issues. However, the key issues for the Wotton Cluster (see page 204 of the Pre-submission Draft Local Plan) specifically identify addressing Kingswood School capacity issues as a top priorities for the area. The Council considers that the proposed scale of development can be justified to meet Kingswood’s local housing need for the Plan period, necessary to sustain the settlement’s role, function and community vitality, and that moderate, planned growth will support the delivery of sustainable accessible pedestrian and cycling improvements within Kingswood and the wider local area, including the Wotton – Charfield – Kingswood Greenway. The County Council has indicated that there is existing capacity at local schools within Wotton under Edge.</p> <p>Site PS38 has been appraised in the SA Report for the Draft Local Plan (see Appendix 7 of that report and Appendix 7 of this SA Report) in line with the information provided by the Council regarding what types of development are to be delivered. As new information is made available from the Council this is used to inform the SA Report.</p>

⁵ Gloucestershire County Council (November 2018) School Places Strategy 2018-2023

Consultee	Representation relating to	Summary of comment made	SA Team Response
		<p>realistic provision the required infrastructure. It is stated that the IDP and Stagecoach’s representation on the Local Plan also do not support this approach.</p>	<p>Site PS36 has also been appraised in the SA Report for the Draft Local Plan (see Appendix 7 of that report and Appendix 7 of this SA Report). The appraisal has been undertaken in line with the other site options making use of the SA assumptions for a consistent approach. The SA has attempted to present the combination of effects which might be possible if new settlements are delivered to reflect the Garden Village principles. Residents may be required to travel longer distances at the infancy of the new settlements in particular considering the limited existing services and facilities accessible at this location. However, it is assumed that the scale of new development will support new service provision which is likely to reduce the need to travel from these locations in the long term. It should be noted that the SA Report forms only part of the evidence base for the selection of site options and policy options for inclusion in the Local Plan. The Council’s reasons for selecting and rejecting of sites have been presented in Table A8.2 of the SA Report for the Draft Local Plan and is presented in Table A9.2 of this iteration of the SA Report.</p> <p>The SA Report reflects the evidence relating to individual site options made available by the Council. The draft site allocation for site PS36 states that the settlement at this location will prioritise a “new rail station enabling rail services to Cam and Gloucester and rapid bus services to the nearest main settlement” and therefore the appraisal findings for the site reflect this. The site promoters are currently investigating the potential options for this. As new information about the requirements for the site allocation have been made available the appraisal of site PS36 has been updated. The updated appraisal of this site option is presented in Appendix 7 of this SA Report. The appraisal of the site reflects the policy requirement for a “new railway station and enhancements to the Sharpness branch line and contributions to support a regular passenger service to Gloucester”.</p>

Consultee	Representation relating to	Summary of comment made	SA Team Response
Rep ref 475 Ridge and Partners LLP	SA rep 22 – consideration of SA findings in relation to site option	<p>The consultee is promoting site option KIN010 and has referred to the SA findings. This site option is compared through the representation to draft allocation PS38 in the Draft Local Plan to attempt to demonstrate its sustainability. The consultee contests the SA findings for site KIN010 in relation to SA objective 2: health, SA objective 6: services and facilities, SA objective 7: biodiversity and geodiversity, SA objective 8: landscape, SA objective 9: historic environment, SA objective 16: employment. Many of the effects contested by the consultee relate to the change in promotion of the site from a 100-dwelling development to a 95-dwelling development to incorporate community facilities and landscape improvements.</p> <p>Therefore, the effects recorded are suggested to be improved as follows:</p> <ul style="list-style-type: none"> ■ SA objective 2 is suggested to be improved from mixed minor positive and minor negative to mixed significant positive and minor negative as the site is now suggested for promotion to include a large area of open space including a wildlife corridor and a dedicated sports. ■ SA objective 6 is suggested to be improved from negligible to minor positive as it lies at a tier 3a settlement. ■ SA objective 7 is suggested to be improved from minor negative to minor positive as the proposal is supported by an Ecological Enhancements Briefing Note and the development could lead to biodiversity enhancements and improved habitat management. ■ SA objective 8 is suggested to be improved from minor negative to negligible as landscaping proposals are included for the site and furthermore the site has a better relationship with the built-up area of the village than the draft allocation PS38. ■ SA objective 9 is suggested for improvement from minor negative to negligible as a heritage report is 	<p>All site options being considered for inclusion in the Local Plan have been appraised consistently in line with the assumptions set out in Appendix 4 of the SA Report for the Draft Local Plan and Appendix 4 of this SA Report. For the initial appraisal of site options (i.e. before the Council has selected its preferred options) all sites have been appraised without consideration for potential mitigation to be achieved onsite (i.e. through landscaping schemes, etc.). This approach has also been taken to support a consistent approach to appraisal between site options (as all sites do not have the same level of detail provided by site promoters).</p> <p>Site option KIN010 has been considered for residential use only in the SA Report for the Draft Local Plan as this is what it was originally promoted for. The detailed appraisal was presented in Appendix 5 of the SA Report for the Draft Local Plan. The appraisal of this site option is presented in Appendix 5 of this SA Report.</p> <p>It should be noted that the SA Report forms only part of the evidence base for the selection of site options and policy options for inclusion in the Local Plan. The Council’s reasons for selecting and rejecting of sites have been presented in Table A8.2 of the SA Report for the Draft Local Plan and is presented in Table A9.2 of this iteration of the SA Report.</p>

Consultee	Representation relating to	Summary of comment made	SA Team Response
		<p>provided to help demonstrate that residential development can be achieved at the site without adverse impacts on the significance of any heritage assets.</p> <ul style="list-style-type: none"> ■ SA objective 16 is suggested for improvement from mixed minor positive and significant negative to minor positive and minor negative as the settlement of Kingsdown has a higher employment offering than of other tier 3a settlement and considering that the employment use of the site is dated and has very limited capacity for job opportunities. <p>The consultee concludes that the suggested amendments to the SA Report for site option KIN010 means that it performs more favourably than the draft allocation PS38 in terms of biodiversity/geodiversity, landscapes/townscapes, historic environment, efficient use of land and flooding.</p>	
Rep ref 487 Cotwolds Conservation Board	SA rep 23 – consideration SA findings in relation to landscape; historic environment; and biodiversity	<p><i>Landscape</i></p> <p>The consultee suggests that there are contradictions between the Stroud District Landscape Sensitivity Assessment (December 2016) and the findings of the SA report in relation to landscape. The consultee states that a 'significant negative effect' was identified by the Sustainability Appraisal in relation to landscape for the Minchinhampton allocation (P05), whilst the Stroud District Landscape Sensitivity Assessment identifies the sensitivity of the landscape for housing development on this site as being 'medium'.</p> <p>The consultee also raises concerns over 'significant negative effects' being identified for site (PS07 – Nailsworth) in relation to landscape. It is stated that the Stroud District Landscape Sensitivity Assessment only identifies the sensitivity of the landscape to housing development as being 'medium' (albeit across a much larger land parcel).</p>	<p>The Landscape Sensitivity Assessment (December 2016) has recorded the land within which the sites in question lie (PS05 and PS07) as having 'medium' sensitivity to residential development and the detailed SA matrices (please see Appendix 7 in the SA Report for Draft Local Plan) for these sites reflect this.. The sites have been appraised in line with the assumptions set out in Appendix 4 of the SA Report for the Draft Local Plan and Appendix 4 of this SA Report. The assumptions have been agreed so that a consistent approach to appraisal can be achieved. For SA objective 8 (landscape), sites that lie within the AONB have been recorded as having an uncertain significant negative effect. This reflects the importance and potential sensitivity of this designated landscape to change.</p> <p>Effects recorded in relation to SA objective 9 (historic environment) have been informed by the findings of the heritage assessment which formed part of the SALA process. For site PS05, heritage constraints relating to the Scheduled Ancient Monument were identified and the site was scored '4' through this process. In line with the SA assumption the site was</p>

Consultee	Representation relating to	Summary of comment made	SA Team Response
		<p><i>Historic Environment</i></p> <p>The consultee suggests that the Minchinhampton allocation (P05) should be classed as a major development due to the 'significant negative effects' identified in relation to the historic environment by the Sustainability Appraisal, particularly due to the potential impacts on the Scheduled Monument.</p> <p><i>Biodiversity</i></p> <p>The consultee also notes that 'significant negative effects' have been identified for site PS07 (Nailsworth) in relation to biodiversity due to the site being within 250m of Woodchester Park SSSI. However, the consultee suggests that it is not clear what the significant negative effect could be as there doesn't appear to be any direct access from the allocation site to the SSSI. They suggest that if the 'significant negative effects' identified stand (subject to further input from Natural England), then the proposed allocation should be considered as a major development.</p> <p>The consultee has sought to make the case that these sites (P05 and PS07) should be classed as major development considering the potential for significant adverse impacts to result on the landscape, the historic environment and/or biodiversity due to development as identified through the SA Report. In this regard it is argued that the District Council has not undertaken a comprehensive assessment of whether the proposed housing allocations in the AONB constitute major development in the context of the NPPF. The NPPF states that definition as major development within an AONB should take account of the nature, scale and setting, and whether the development could have a significant adverse impact on the purposes for which the area has been designated or defined.</p>	<p>recorded as having potential to have a significant negative effect in relation to this SA objective.</p> <p>The SA assumptions established distance-based criteria to ensure consistency of appraisal of sites in terms of potential impacts on biodiversity sites in and surrounding the plan area (although it is noted that distances are used as an <u>indication</u> of the potential for effects, the likelihood for effects to occur would need to be assessed in more detail as part of the planning application process for each site, once specific development proposals are known). Residential sites within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites were identified as having potential for a significant negative effect considering that habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure may result as development occurs and is occupied. These criteria account for the potential significant negative effect recorded for the site.</p> <p>It should be noted that the SA Report forms only part of the evidence base for the selection of site options and policy options for inclusion in the Local Plan. It is a separate component of the plan preparation process. The Council's reasons for selecting and rejecting of sites have been presented in Table A8.2 of the SA Report for the Draft Local Plan and is presented in Table A9.2 of this iteration of the SA Report.</p>

Consultee	Representation relating to	Summary of comment made	SA Team Response
<p>Rep ref 493b Pegasus on behalf of Robert Hitchins Ltd</p>	<p>SA rep 24 – consideration of sustainability effects identified through the SA Report in relation to site options in Local Plan</p>	<p>Refers to the text of the SA Report to challenge the justification for moving Painswick from a Tier 3 settlement to Tier 2. The text highlighted relates to the potential sensitivities of the settlement to residential or employment development and wider sensitivities of the eastern portion of the District, the Severn Estuary as well as other important biodiversity sites in the plan area.</p> <p>The comment refers to the SA commentary which highlights the benefits of focussing on the Tier 1 settlements for strategic growth as well as that the early years at the new settlements may provide residents with limited access to a wider range of facilities and services and a lack of public transport. It also notes the SA flags that delivering a high level of development at the new settlement by Sharpness (which the consultee contests) could have implications for the Severn Estuary SSSI/SPA/SAC/Ramsar site.</p> <p>The consultee also contests the failure to allocate site STO006. The site has been considered through the SA for mixed use purposes but as the site has been promoted for residential purposes this is disagreed with by the consultee.</p> <p>The comment also includes detail on site PS21. It is stated that the site performs well in the SA with 'less impact' on biodiversity (SA objective 7), landscapes/townscapes (SA objective 8) and air quality (SA objective 10), than other sites at Cam. It is acknowledged that the site has been identified as having a significant negative effect with regard to the historic environment (SA objective 9), however the consultee states that this matter can be addressed with a sensitive and appropriate layout and design and materials.</p> <p>Commentary is also included in relation to site WHI001 with the consultee highlighting that the SA reported 'no</p>	<p>Comment noted and no implications for the SA findings.</p> <p>The SA Report forms only part of the evidence base for the decision making and selection of site options and policy options for inclusion in the Local Plan. It is a separate component of the plan preparation process. The Council's reasons for selecting and rejecting of sites have been presented in Table A8.2 of the SA Report for the Draft Local Plan and is presented in Table A9.2 of this iteration of the SA Report.</p>

Consultee	Representation relating to	Summary of comment made	SA Team Response
		discernible impact' on the historic environment (SA objective 9), water quality (SA objective 11), climate change (SA objective 14) or waste (SA objective 15). The minor positive effect relating to housing (SA objective 1), health (SA objective 2) and economic growth (SA objective 17) are also highlighted.	
Rep ref 559 (redacted individual comment)	SA rep 25 – contesting whether site option meets the SA sub-objectives	The consultee objects to the development of 1,500 homes proposed in the area of Slimbridge. In relation to the SA Report, the consultee highlights a number of the SA sub-questions and queries whether the development at Slimbridge is in line with the sub-questions and policy requirements.	See response above for Rep ref 201 in relation to the SA sub-objectives. It should be noted that the SA Report forms only part of the evidence base for the selection of site options and policy options for inclusion in the Local Plan. The Council's reasons for selecting and rejecting of sites have been presented in Table A8.2 of the SA Report for the Draft Local Plan and is presented in Table A9.2 of this iteration of the SA Report.
Rep ref 560 (redacted individual comment)	SA rep 26 – contesting whether site option meets the SA sub-objectives	The consultee objects to the development of 1,500 homes proposed in the area of Slimbridge. In relation to the SA Report the consultee highlights a number of the SA sub-questions and queries whether the development at Slimbridge is in line with the sub-questions and policy requirements.	See response in the row above for Rep ref 201.
Rep ref 561 (redacted individual comment)	SA rep 27 – contesting whether site option meets the SA sub-objectives	The consultee objects to the proposed development for the area of Slimbridge. In relation to the SA Report the consultee highlights a number of the SA sub-questions and queries whether the development at Slimbridge is in line with the sub-questions and policy requirements.	See response above for Rep ref 201.
Rep ref 562 Slimbridge Quiet Lanes Group	SA rep 28 – contesting whether site option meets the SA sub-objectives and the policy	The consultee objects to the development proposed in the area of Slimbridge and Cam (1,500 homes at Wisloe and further homes at Cam). The consultee highlights a number of the SA sub-questions and queries whether the development in question is in line with these. The comment also refers to the requirements of the NPPF which have been highlighted through the Plans, Policies	See response above for Rep ref 201 in relation to the SA sub-objectives. The review of international and national Plans, Policies and Programmes undertaken as part of the SA Report forms the sustainability context for the SA. In effect it acts to inform the preparation of the SA Framework (Table 2.2 in the Local for the

Consultee	Representation relating to	Summary of comment made	SA Team Response
	context set out through the PPP review in the SA Report	and Programmes (PPP) review in the SA Report in relation to transport issues and queries whether the development in question is in line with those policy requirements.	Draft Local Plan and Table 2.2 of this iteration of the SA Report) which is used to appraise the various site and policy options considered for the Local Plan. In addition, the Local Plan must be in conformity with national policy (as set out in the NPPF), and this forms one of the tests of soundness at the Examination stage.
Rep ref 563 Wisloe Action Group	SA rep 29 – contesting whether site option meets the SA sub-objectives and the policy context set out through the PPP review in the SA Report	<p>The consultee objects to the development proposed in the area of Slimbridge and Cam (1,500 homes at Wisloe and further homes at Cam). The consultee highlights a number of the SA sub-questions and queries whether the development in question is in line with these. The comment also refers the requirements of the NPPF which have been highlighted through the Plans, Policies and Programmes (PPP) review in the SA Report in relation to transport issues and queries whether the development in question is in line with those policy requirements.</p> <p>It is also stated in the comment that the three sites appraised in 2018 (Emerging Strategy Paper and SA Report for that stage of the Local Plan) at Wisloe (SLI002, SLI004 and SLI005) should have been assessed together as one option at this stage so that impacts of all development together could be considered. The consultee also makes reference to the need to be considerate of all options in relation to Wisloe as well as Cam.</p>	<p>See response above for Rep ref 201 in relation to the SA sub-objectives, and the PPP review.</p> <p>The 2018 SA Report for the Emerging Strategy Paper appraised the three site options at Wisloe (SLI002, SLI004 and SLI005) which have come together to comprise the potential site allocation PS37 for the new garden settlement at this location. The 2018 SA Report also presented an appraisal of the larger site PS37, i.e. an appraisal of these three site options together (please see page 663 of Appendix 6 of that report). This appraisal was updated in the 2019 SA Report to reflect updated data sources and changes to the requirements of the draft site allocation text in the Draft Plan. The appraisal of this site is represented in Appendix 7 with updated data sources reflected. It should be noted that the 2019 SA Report for the Draft Local Plan presents cumulative effects of the plan in Chapter 6. These effects considered the effects of potential site allocations in addition to the other policies in the plan (which might in some cases help to mitigate the effects of development).</p>
Rep ref 607 (redacted individual comment)	SA rep 30 – consideration of sustainability effects identified through the SA Report in relation to site option in Local Plan	The consultee contests the details in the SA Report which state that there will be a station and improvements to the roads at site PS36. It is also highlighted that the SA states that the former Berkeley Power station site is being promoted for training and employment opportunities. The comment highlights the SA's reporting of a significant negative effect in relation to biodiversity/geodiversity and the historic environment (SA objective 7 and 9) and uncertain effects in relation to landscape/townscape (SA objective 8). The potential for a negative effect relating to	<p>Comments noted where the SA findings have been used to support the consultee's argument. The consultee has queried whether the SA can assume that transport infrastructure improvements will be delivered at site PS36, and the effects identified relating to air quality (SA objective 10) and climate change (SA objective 14) for the former Berkeley Power Station site.</p> <p>The site options have been appraised in the SA Report using the SA assumptions presented in Appendix 4 of the SA Report for the Draft Local and Appendix 4 of this iteration of the SA Report</p>

Consultee	Representation relating to	Summary of comment made	SA Team Response
		<p>air quality and climate change (SA objective 10 and 14) are also highlighted although it is also stated that these effects have been discounted as part of the appraisal.</p> <p>The positive effect identified for the site in relation to housing (SA objective 1) is also queried. The consultee questions if the developer could deliver affordable homes and states that in any case it is not guaranteed that low income households could afford to buy the new homes provided at the site.</p>	<p>to ensure a consistent approach to the appraisal of hundreds of site options. The SA Report forms only part of the evidence base for the selection of site options and policy options for inclusion in the Local Plan. The Council's reasons for selecting and rejecting of sites have been presented in Table A8.2 of the SA Report for the Draft Local Plan and is presented in Table A9.2 of this iteration of the SA Report.</p> <p>In relation to the appraisal of site PS36, the site allocation text in the Draft Local Plan indicates that a new railway station and bus services are to be provided at the new settlement at this location. The site promoters are investigating the potential options for this. It is understood that this will be a requirement which developers of the site will need to commit to before planning is granted for the site so it is considered reasonable for the SA findings to reflect this type of provision at the site. As more detailed requirements are provided in the site allocation policy in the next version of the Plan, the appraisal will be updated to reflect them.</p> <p>The consultee has not quoted which part of the Draft Local Plan they are referring to in relation their comments on the former Berkeley Power Station site. However, it is assumed that they are referring to the appraisal of Policy EI2a which sets out the approach for this land. The SA Report has identified a number of negative effects in relation to this policy as described from paragraph 4.186 of the SA Report for the Draft Local Plan and in this iteration of the SA Report from paragraph 4.205. While the SA Report for the Draft Local Plan identified that employment opportunities at the site could include renewable and low carbon energy generation which are likely to have benefits in terms of moving to more carbon neutral energy production locally, the potential negative effects were not discounted. Instead the SA Report recorded a mixed overall (minor positive and minor negative) effect in relation to climate change (SA objective 14) with consideration for the more isolated location of the site which may result in employees having to travel by car to this location. This policy has not been updated from the adopted</p>

Consultee	Representation relating to	Summary of comment made	SA Team Response
			<p>Local Plan through the Local Plan Review and therefore the supporting text of the policy in the adopted Local Plan will remain the same. The supporting text of the policy identifies that site may provide opportunities for research facilities related to renewable energy. A minor negative effect was identified for this policy in relation to air quality (SA objective 10) which also reflects its more isolated location.</p> <p>It is presumed that the query the consultee has raised relating to effects recorded on SA objective 1 are concerned with site PS36. A significant positive effect has been recorded for this site given that it would deliver 2,400 dwellings over the plan period. In line with the SA assumptions all sites which have capacity for the delivery of 600 homes or will have a significant positive.</p>
Rep ref 625 Eastington Parish Council	SA rep 31 – consideration of sustainability effects identified through the SA Report in relation to site option in Local Plan	The consultee disagrees with the allocation of site PS20. The comment highlights a number of significant negative effects recorded in the SA Report for the site in relation to the landscapes/townscapes (SA objective 8), historic environment (SA objective 9), flooding (SA objective 12) and efficient land use (SA objective 13). A minor negative effect is also highlighted in relation to biodiversity and geodiversity (SA objective 7). Negligible effects are also highlighted in relation to housing (SA objective 1), social inclusion (SA objective 3), crime (SA objective 4), climate change (SA objective 14) and waste (SA objective 15). The minor positive identified for the site in relation to vibrant communities (SA objective 5) following the implementation of the policy which sets out the requirement for development at the site has been queried through the comment.	<p>Comment noted in relation to the consultee’s highlighting of various effects in relation to the site in question and no changes to the SA Report required.</p> <p>It should be noted that the minor positive effect identified for the site in relation to vibrant communities reflects the Draft Local Plan Site Allocation Policy for PS20 which requires that sports facilities are provided at the site. SA objective 5: vibrant communities is concerned with improving the satisfaction of people with their neighbourhoods and enhancing the identity of the District’s existing communities (see the SA framework in Table 2.2 of the SA Report for the Draft Local Plan and Table 2.2 of this SA Report). It is expected that the provision of these types of uses in the District could help contribute to these aims.</p>
Rep ref no 849	SA rep 32 – contesting whether site option meets the SA sub-	The consultee objects to the development proposed in the area of Slimbridge and Cam (including 1,500 homes at Wisloe and further homes at Cam). The consultee highlights a number of the SA sub-questions and queries whether the development in question is in line with these.	<p>See response above for Rep ref 201 in relation to the SA sub-objectives.</p> <p>It should be noted that the SA Report forms only part of the evidence base for the selection of site options and policy options for inclusion in the Local Plan. The Council’s reasons for selecting</p>

Consultee	Representation relating to	Summary of comment made	SA Team Response
(redacted individual comment)	objectives and the policy context set out through the PPP review in the SA Report		and rejecting of sites have been presented in Table A8.2 of the SA Report for the Draft Local Plan and is presented in Table A9.2 of this iteration of the SA Report.

Table A1.4 Consultation responses to comments on the SA Report for the Additional Housing Options paper

Consultee	Summary of comment made	SA Team Response
<p>SA focussed consultation rep 1 (redacted individual comment)</p>	<p>I would like to see all sites given a Sustainability rating against all of the areas that are listed in this report. Quite often developer profit is taken over the sustainability ratings. I'd like the sustainability ratings to be made public for each site allocation so we can see what really drives the planning decisions.</p>	<p>All site options considered reasonable alternatives for inclusion in the Local Plan have been appraised as part of the SA. A summary of the potential effects for all site options appraised is presented in Appendix 7 in this SA Report.</p>
<p>SA focussed consultation rep 2 (redacted individual comment)</p>	<p>This is an incredibly detailed but complex document. I am surprised the SA Objectives do not include access to public transport, particularly rail. I also realise that this is more of a Government strategy, but protecting food production needs to be taken into account when considering use of farmland. The COVID crisis brought this to the fore.</p>	<p>The effects recorded for SA objective 10: air quality for the residential and mixed use site options was based on the findings of the SALA Transport Assessment which reflected the accessibility of railway stations, town/district/local centres, employment sites and services and facilities by walking, car and bus. It is considered inappropriate to include a separate SA objective relating to transport as this would result in a 'double-counting' of effects relating to access to public transport. SA objective 13: land use considered the effect the development of site options could have on agricultural land.</p>
<p>SA focussed consultation rep 3 (redacted individual comment)</p>	<p>An interesting read. Comments as below: "Additional development in these areas could have adverse impacts on the character of the Cotswolds AONB" - so - why are the Cotswolds always protected to the detriment of other areas within the district? " Option D is likely to increase greenfield land take at more rural locations, As well as potentially affecting the existing character of a high number of more rural settlements, this option could therefore increase the potential for flood risk as the area of impermeable surfaces in the district is greatly increased. This could include areas near the Severn Estuary where some lower order settlements are located and could result in residents being at risk from flooding from this water body" - as I noted in my comments around any large scale Whitminster development causing flooding in Moreton Valence.</p>	<p>Planning policies for England are set out in the National Planning Policy Framework (NPPF) which states that "great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues." This approach is reflected in the approach of the SA and the appraisal of the individual site options and options for the growth strategy.</p> <p>The remaining points made by the consultee are noted. Many of these remaining comments highlight the findings of the SA work to support the consultees preferred option. In relation to the comment that the appraisal is weighted in favour of the Whitminster and Moreton Valence sites; the appraisal of these sites (WHI014 (PGP1) and HAR006-HAR009 and HAR015-HAR016 (PGP2)) was presented separately from the other site options considered as part of the Additional Housing consultation given the larger size of these sites compared to the other sites considered for allocation at this stage.</p>

Consultee	Summary of comment made	SA Team Response
	<p>Table 2 - Option A - intensify remaining sites: this seems to be the most viable and sensible option.</p> <p>1.36 - The growth options at Moreton Valence/Hardwicke and Whitminster would in effect comprise substantial extensions to the settlements at which they are located. Agreed so why do it?</p> <p>1.45 - It is likely that the re-use of brownfield land would help to prevent the loss of higher value agricultural soils. Re-use of brownfield land is a more efficient approach to land use in the district while also providing opportunities to re-use of materials already on site - Agreed</p> <p>1.59 to 1.67 - it is interesting that it is assumed because we live in a rural area we want to have access to a new local centre. Why do these people who write these reports assume what we want? If we wanted access to more facilities then we would choose to live in an urban area and NOT a rural one.</p> <p>1.72 - there's that mention of flooding again and a higher risk one at that.</p> <p>1.73 - as was pointed out to me when I tried to obtain planning permission for a garden room - we are speaking about high value Grade 2 and 3 agricultural land.</p> <p>1.75 - we already have several primary schools to choose from and don't need anymore - the only reason more would be needed is because you want to develop land with houses.</p> <p>The appraisal is heavily weighted in favour of building in Whitminster and Moreton Valence which is hugely disappointing and also worrying that data, as always, can be massaged to fit whatever outcome is needed at the detriment of the people it will effect.</p>	<p>The large size of these two site options means they can provide a variety of uses as well as new services and facilities. This has informed the appraisal of these two sites. Given the potential benefits of allocating these larger sites for a wider range of uses (as well as the delivery of new services and facilities) it is considered more useful to present these sites alongside each other or separate from the other, smaller site options in the SA work for the Additional Housing Options. This approach has been taken to allow for a 'like-for-like' comparison of site options.</p>
SA focussed consultation rep 4	<p>At 117 pages it is pretty well impenetrable. I don't see how Table 3 can make any distinction between positives and negatives for BER016 and BER017, when they are in effect the same site. For example air quality and health.</p>	<p>BER016 and BER017 lie adjacent to each other however the proximity of these sites to nearby services and facilities differs. All site options have been appraised making use of the SA assumptions in Appendix 4 in this SA Report to ensure a consistent approach. Site BER016 is in close proximity of a GP surgery, council play area, protected outdoor playspace, green space and cycle route. Site</p>

Consultee	Summary of comment made	SA Team Response
(redacted individual comment)		BER017 is in close proximity to all these types of features apart from a cycle route meaning the positive effect expected for this site in relation to health (SA objective 2) is reduced compared to site BER016. The appraisal of these sites in relation to air quality (SA objective 10) is based on the findings of the SALA Transport Assessment. While neither site was included in this work, site BER016 lies adjacent to site BER005 which was assessed through that work. Site BER017 is not adjacent to site BER005 and therefore the effect relating to this SA objective is recorded as uncertain.
SA focussed consultation rep 5 (redacted individual comment)	Good on paper but protection and enhancement of the surrounding natural environment must be part of any such developments.	Comment noted – no implications for SA. All site options and options for growth have been appraised in relation to biodiversity and geodiversity (SA objective 7), landscapes and townscapes (SA objective 8), air quality (SA objective 10), water quality (SA objected 11), efficient land use (SA objective 13), climate change (SA objective 14) and waste (SA objective 15). The options appraised have therefore been tested in relation to impacts on important impacts on elements of the natural environment.
SA focussed consultation rep 6 (redacted individual comment)	We need new house built with Cotswold stone that have big gardens and parking and garages.	Comment noted – no implications for SA.
SA focussed consultation rep 7 (redacted individual comment)	The capacity of Junctions 12 and 13 of the M5 are not capable of handling any more local developments, especially on top of what is planned for Great Oldbury and Forest Green football club. Traffic to reach these junctions in the mornings can already be horrendous, there is just no more capacity on the A38 and A419. Development will also harm health provision, landscape and habitat for wildlife.	Spatial option A considers the potential to intensify current urban extension sites in the plan area which would include new development within the Gloucester fringe area. This area is in close proximity to Junction 12. No evidence is presently available in relation potential transport issues for this approach. Spatial option C2 considers the potential for a new growth point to the east of Junction 13. The appraisal of this option notes that the potential for high levels of congestion to result along routes from this junction means some of the positive effects recorded are

Consultee	Summary of comment made	SA Team Response
		<p>uncertain. For all variations of option C, the highest level of development is to occur where most future transport improvements will be located which will help to address transport issues.</p> <p>All site options and options for growth have been tested in relation to potential impacts relating to health (SA objective 2), biodiversity and geodiversity (SA objective 7) and landscape and townscape (SA objective 8).</p>
<p>SA focussed consultation rep 8 (redacted individual comment)</p>	<p>It is impossible to cite any assessment of air quality impact through Dursley town centre A4135 when it has simply not been measured by the council, despite requests being made from residents and councillors.</p> <p>A clear distinction should have been made, and should now be made, between development along the A4135 to the north east of Silver Street pinch point and proposals to the south east of Silver Street. Most traffic from the south east A4135 travels out through the town centre towards the A38.</p> <p>The planned town 'bypass' through the Crest Nicholson estate is actually a congested and hazardous on-road car park for the unfortunate residents who have insufficient private parking space. Along with consideration of AONB landscape impacts, this bypass failure is one of the reasons why development should never be allowed to the south east of Dursley town centre.</p>	<p>Spatial option C3 considered the general principle for development along the strategic road network at the A4135. At the time of appraisal, no decision had been made in relation to the delivery of development in this area or any specific location and therefore this general approach to the appraisal is considered appropriate and reasonable.</p>
<p>SA focussed consultation rep 9 (redacted individual comment)</p>	<p>It is quite difficult to digest but in summary I agree with the recommendation of a hybrid approach of A and C as per my answers to the survey questions</p>	<p>Comment noted – no implications for SA.</p>
<p>SA focussed consultation rep 10</p>	<p>Please tell me you are kidding? 126 pages...? The layman is expected to read that and understand it? no way.</p> <p>Here is my impression:</p>	<p>A summary of the SA findings for the options for growth is included at paragraph 1.19 of the SA Report for the Additional Housing Options. A summary of the findings for the new small site options and the new growth point options is presented at paragraph 1.41 and paragraph 1.59, respectively of that SA Report. The conclusions</p>

Consultee	Summary of comment made	SA Team Response
(redacted individual comment)	<p>No summary shorter and more concise</p> <p>Not a balanced view or argument posed as to of whether the housing numbers are needed. Sustainability primary question should surely be what do we actually need to be sustainable as opposed to simply justifying or not options to meet a notional target</p>	<p>(from paragraph 1.76) provide a synopsis of the findings, drawing out the key points from the appraisal work undertaken.</p> <p>As per the SEA Regulations, a Non-Technical Summary has been presented alongside this SA Report for the Regulation 19 Local Plan, to provide a summary of the key points of the SA Report.</p> <p>The level of housing considered through this consultation and appraised through the SA reflects the potential need to provide for 786 new homes per annum in the District. The figure reflected potential changes to the method used to calculate the minimum housing requirement for each local authority area in the country. At time of publication, the appraisal was required given the publication by Government of the consultation document which proposed changes to the method.</p>
SA focussed consultation rep 11 (redacted individual comment)	<p>It is my opinion that sustainability, in terms of planning development of future housing needs, does not involve covering hundreds of hectares with housing and roads. All eventualities for using brownfield and town centre sites should be explored before greenfield sites are considered. Brownfield and town centre sites invariably have the infrastructure in place to support extra development, with perhaps moderate improvement.</p>	<p>The SA Report has considered the potential benefits of all options for growth in relation to the re-use of brownfield land through SA objective 15: waste.</p>
SA focussed consultation rep 12 (redacted individual comment)	<p>I broadly support the conclusion at 1.82. Development of the site at the junction of the M5 looks a good option to me.</p>	<p>Comment noted – no implications for SA.</p>
SA focussed consultation rep 13 JJH Engineering Limited	<p>So much could be written regarding this 125 page document however it would appear that the conclusions mentioned within this document are similar to the points I have raised in the earlier sections. Namely that a hybrid of option A and C is the most favourable. I also have to agree that development option D would result in overburdening of services in many areas, there would be a negative effect regarding bio and geodiversity and possible</p>	<p>The SA Report has considered the potential benefits of all options for growth in relation to the re-use of brownfield land through SA objective 15: waste. The SA objectives have not been given an individual weighting.</p>

Consultee	Summary of comment made	SA Team Response
	increased flood risks where these areas are being considered. The use of brown field sites should be considered far more favourably.	
SA focussed consultation rep 14 Cam Parish Council	It should be noted that the most sustainable model is one which enhances existing employment and retail sites rather than creating new sites from scratch. New sites are difficult to network to the energy grid and can often lead to more commuting and therefore more pollution and greater carbon creation. Concreting the countryside is no substitute to good urban planning and expansion using brown field sites wherever possible. Green business models should be encouraged, cycle networks linked to national routes and super fast broadband be rolled out to more rural communities to reduce commuting and encourage more home working.	The SA Report has considered the potential benefits of all options for growth in relation to the re-use of brownfield land through SA objective 15: waste.
SA focussed consultation rep 15 (redacted individual comment)	<p>At 127 pages I neither have the time or the eyesight to read it but I'm sure, because it's Stroud, it's excellent.</p> <p>I very much believe that all new housing needs to be built with the environment and the future in mind.</p> <p>Instead of intensive housing crammed into smaller spaces I believe we should be reducing the number of houses built on sites (even if it means more smaller sites) to allow for bigger gardens, wider streets, verges, landscaping, trees and green spaces and wildlife corridors. All of these measures will aid sustainability and the attractions of development like this would endear it more to the communities in which they are embedded.</p> <p>We need to be working towards a carbon neutral situation so all new housing should have heating alternatives to gas, solar panels, fast car charge points and fast broadband.</p> <p>Come on Stroud set an example.</p>	Comment noted – no implications for SA.
SA focussed consultation rep 16	The sustainability appraisal was 120 pages long. The ability for most people to read, understand and comment on such a document is nearly impossible. It is clear that huge scale development being suggested is unsustainable in the true sense of the word. Continual enormous development year on year in absolutely and undeniably unsustainable. Stating this to government needs to priority. The	A summary of the SA findings for the options for growth is included at paragraph 1.19 of the SA Report for the Additional Housing Options. A summary of the findings for the new small site options and the new growth point options is presented at paragraph 1.41 and paragraph 1.59, respectively of that SA Report. The conclusions

Consultee	Summary of comment made	SA Team Response
(redacted individual comment)	way in which housing is managed in the UK can be much better achieved through policy changes and an overhaul of property rights, landownership and caps on profit would make available many hundreds of thousands of properties that would reduce the "need" for more housing. As a rural and beautiful county Stroud council has the responsibility to protect and maintain our environment and welfare, please stand up for what is right and fundamentally important for future generations	<p>(from paragraph 1.76) provide a synopsis of the findings, drawing out the key points from the appraisal work undertaken.</p> <p>As per the SEA Regulations, a Non-Technical Summary has been presented alongside this SA Report for the Regulation 19 Local Plan, to provide a summary of the key points of the SA Report.</p> <p>The level of housing considered through this consultation and appraised through the SA reflects the potential need to provide for at 786 new homes per annum in the District. The figure reflects potential changes to the method used to calculate the minimum housing requirement for each local authority area in the country. The potential changes may be needed given the publication by Government of a consultation document which proposes changes to the method.</p>
SA focussed consultation rep 17 (redacted individual comment)	I believe I have made this contribution above. But, in case the survey is question orientated, I repeat that whatever housing is planned, without either access to local employment or easy access to more distant employment is made available, the housing will simply become a "tick box" number without any sustainability whatsoever.	The SA Report through SA objective 16: employment has considered the accessibility of sites to employment opportunities.
SA focussed consultation rep 18 (redacted individual comment)	It's pointless and will be surpassed within a year	Comment noted – no implications for SA.
SA focussed consultation rep 19 (redacted individual comment)	<p>This relates to "WHI014/PGP1: Land at Grove End Farm".</p> <p>There appears to be little consideration for access to local facilities.</p> <p>There is only the "Primary School" which will probably not be able accommodate any additional pupils.</p> <p>The report simply states "The site is not within 800m of a GP". The only GP facility which is available is in Frampton which serves</p>	<p>All site options have been appraised making use of the SA assumptions in Appendix 4 in this SA Report to ensure a consistent approach.</p> <p>In terms of access to services and facilities the settlement hierarchy has been used to gauge the level of service provision accessible from the site. The site lies by Whitminster, a tier 3a settlement. The Settlement Role and Function Study Update states that these</p>

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	<p>Whitminster and will probably not be able to facilitate any additional patients.</p> <p>Any assessments carried out should include projected transport usage as the number of houses proposed will impact on the transport network. This results not only from the additional number of cars on the road at the dangerous School Lane/A38/Grove Lane interface and will impact the access onto the A38 via these side roads, especially at peak times and any incidents long the local stretch of the M5..</p> <p>There will also be impact from additional traffic resulting from movement of school buses/coaches, especially along the A38 unless access to and from the proposed site is away from the A38.</p> <p>Local facilities are limited in Whitminster. Therefore, there will be a large impact on the transport network, as there will be a need to transport a large number of people around the area, mainly at peak times with the additional risks given the limited access points onto the A38.</p>	<p>settlements have little “strategic” role or function but they all provide a good range of local services and facilities for the community.’ A minor positive effect has therefore been recorded for the site in relation to SA objective 6: services and facilities. Given that the site is to be delivered to include a new local centre the minor positive effect is increased to a significant positive effect.</p> <p>Access to healthcare services and schools have been reflected through the appraisal of SA objectives 2: health and 17: economic growth respectively. The appraisal of SA objective 17 reflects close proximity of the site to Whitminster Endowed Church of England Primary School and that its development could also include the delivery of a new primary school. The significant positive effect recorded in relation to SA objective 17 also reflects the potential delivery of a large area of employment land at the site which would support economic growth in the plan area. The appraisal of SA objective 2 and 17 does not reflect the potential capacity issues at healthcare facilities and schools given the difficulties in obtaining this information consistently for all sites. The potential implications of development in the plan area in relation to capacities at schools has instead been considered at a District wide level in the SA Report.</p> <p>The consideration of transport work at a site specific level is not within the scope of SA given its strategic scale and instead is a consideration for the preparation of the Local Plan and the selection of the preferred sites for allocation. Transport work for individual sites will also be of relevance for project level planning when any planning applications are submitted.</p>
<p>SA focussed consultation rep 20 (redacted individual comment)</p>	<p>In my opinion it does not make sense to cover hundreds of hectares with housing and roads, destroying nature and already established communities, before using every other option - such as brownfield, town centre and unoccupied and derelict buildings in situations where the support structure is already available.</p>	<p>The SA Report has considered the potential benefits of all options for growth in relation to the re-use of brownfield land through SA objective 15: waste.</p>

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<p>SA focussed consultation rep 21</p> <p>(redacted individual comment)</p>	<p>In general, I would like Stroud District Council to push for the re-use of brown field sites, rather than allow the undeniably easier route of building on green fields in village areas.</p> <p>There is an abundance of former mill sites, factories and disused land throughout the Stroud area that should be used for infill building, thereby utilising the existing road and power infrastructure.</p> <p>Gloucestershire is a rural county, and is defined by its countryside character and green fields. We should not allow the destruction of this character."</p>	<p>The SA Report has considered the potential benefits of all options for growth in relation to the re-use of brownfield land through SA objective 15: waste. The SA Report has also considered the impacts of development in relation to landscape and character (including the historic environment) through SA objectives 8: landscapes/townscapes and 9: historic environment, respectively.</p>
<p>SA focussed consultation rep 22</p> <p>Holywell Farm and 89 Court Orchard Partnership</p>	<p>The sustainability appraisal is undoubtedly a considerable body of work provided to the Local authority. It is however giving the answers that the authority favour at considerable consultancy cost. It is found to be objectionable on a cost and political basis to invest in such consultancy in an attempt to demonstrate democracy. Again this may not be aimed at officers but the planning system and planning machinery that they are forced to operate.</p>	<p>The SA Report has been undertaken as a statutory requirement of the Planning and Compulsory Purchase Act 2004. In line with the National Planning Practice Guidance the document has been prepared as a joint SA/SEA process. It is therefore required to address the SEA Regulations which are detailed in Table 1.1 of the SA Report. The table shows where these regulations have been met in the SA Report. The SA appraisals of policies, sites and their reasonable alternatives have been undertaken in line with the agreed SA framework and with regard for the associated assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted upon at previous iterations of the SA Report (i.e. at the Regulation 18 and Scoping stages). These reflect the key sustainability issues which have been identified for Stroud District as presented in Chapter 3 of the SA Report. The methodology used for the SA Report has been set out in Chapter 2. This approach has been taken to ensure consistency and objectivity for the SA findings in relation to sites and policies which have been subject to appraisal.</p>
<p>SA focussed consultation rep 23</p>	<p>The consultation does not mention energy use or transport.</p> <p>None of these options should be pursued without minimizing the energy requirements of the building and reducing car dependency.</p>	<p>The design requirements set out by the consultee were outside of the scope of the Additional Housing Options paper which the Council consulted upon. The consultation was intended to have a narrow focus on the spatial and site options set out in the document. The design considerations identified by the consultee are not necessarily</p>

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(redacted individual comment)	<p>To this end all houses should be built to passivehaus standards. This is not a difficult requirement. It requires better design and some additional training for builders. It also requires better testing during construction to ensure that buildings meet the required specifications.</p> <p>There is no point building these houses if it increases car usage and does not provide other transport options. All developments must come with excellent reliable public transport options. They must also come with excellent segregated cycle infrastructure. They must also be car free in their immediate vicinity. I recognise the need for cars but they should not be in the spaces in which we live. They can easily be located on the edge of towns in high quality secure covered (in solar panels) car parks. Shared micro mobility options can be incorporated for last mile connections between car and houses and shared cargo bike and electric bike options should be provided to encourage people to use these rather than cars. This will massively reduce the dependency on cars reducing the cost of maintaining roads, save people money, increase air quality etc. etc.</p>	<p>specific to any one growth strategy option or site option considered through the focussed consultation. The Council's approach to design which might help to minimise energy requirements and reduce car dependency in the District are included in the Regulation 19 Local Plan and have been appraised through this SA Report.</p> <p>These points considered, the SA work for the Additional Housing Options and all other stages of the SA have considered the potential to reduce car dependency through SA objective 10. This SA objective (against which all site, policy and growth strategy options have been tested) includes the sub-objectives:</p> <p>SA 10.2: Does the Plan promote more sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion, including public transport, walking and cycling?</p> <p>SA 10.3: Does the Plan promote more sustainable transport patterns in rural areas?</p> <p>SA 10.4: Does the Plan facilitate the continued restoration, management and promotion the canal towpaths as part of the transport infrastructure</p> <p>SA objective 14 has considered the potential for site, policy and growth strategy options to support strategies that help mitigate global warming and includes the following relevant sub-objectives:</p> <p>SA 14.1: Does the Plan promote energy efficiency and the generation of clean, low carbon, decentralised and renewable electricity and heat?</p> <p>SA14.2. Does the Plan promote the incorporation of small-scale renewable in developments?</p> <p>SA 14.3: Does the Plan promote and facilitate the use of electric cars and sustainable modes of transport?</p> <p>SA 14.4: Does the Plan encourage the use of designs and materials which will promote energy efficiency at new development in the District?</p>

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SA focussed consultation rep 24 (redacted individual comment)	Big word that people on the planning committee need to understand before they implement anything.	Comment noted – no implications for SA.
SA focussed consultation rep 25 (redacted individual comment)	Can't comment as the link to it on the local plan review does not work.	Comment noted – no implications for SA.
SA focussed consultation rep 26 (redacted individual comment)	<p>The Sustainability Appraisal is extremely difficult to digest as a lay person and the conclusions seem to not only consider the housing options but overlay them onto the, as yet not concluded, Local Plan.</p> <p>The assessment methodology is not clear in relation to considerations - with some sites (PS36, for example) being considered in terms of the conclusion of development and the access/infrastructure that could be delivered via proposed development; versus a consideration of the existing position.</p>	<p>The conclusions of the SA Report for the Additional Housing Options paper highlights which options for the growth strategy might have the most sustainability benefits and what the specific benefits for each option are likely to be. The Council has considered all evidence base documents produced to support the preparation of Local Plan. This includes, but is not limited to the findings of the SA. The reasons for the decision making of the Council is included in this SA Report in Appendices A9.1 and A9.2 which present reasons for including or rejecting individual site options and for taking forward policy options.</p> <p>The assumptions set out for the appraisal of site options (see Appendix 4) of this SA Report have informed the appraisal of site options and allowed it to be undertaken in a consistent manner. Where larger site options have been identified by the Council as being reasonably expected to support the delivery of new services and facilities or other uses this has also been reflected in the findings for the individual site options.</p>
SA focussed consultation rep 27	The Sustainability Appraisal has identified a very broad and complete list of parameters to measure the different options.	The SA appraisals of policies, sites and their reasonable alternatives have been undertaken in line with the agreed SA framework and with regard for the associated assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA

Consultee	Summary of comment made	SA Team Response
(redacted individual comment)	<p>However, the findings seem to be often too broad brush and show insufficient knowledge of the local environments to make the correct comparisons.</p> <p>This may be partly due to what seems an incorrect categorization of the settlements which may not be the fault of the Appraisal authors. An example of this is to lump the towns of Nailsworth, Minchinhampton and Painswick together in Tier 2. These towns may have not dissimilar populations but are very different in terms of infrastructure and should not have the same tiering.</p>	<p>Regulations and have been consulted upon at previous iterations of the SA Report (i.e. at the Regulation 18 and Scoping stages). These reflect the key sustainability issues which have been identified for Stroud District as presented in Chapter 3 of the SA Report. The methodology used for the SA Report has been set out in Chapter 2. This approach has been taken to ensure consistency and objectivity for the SA findings in relation to sites and policies which have been subject to appraisal.</p> <p>The SA Report has been informed by relevant evidence base documents for preparation of the Local Plan. This includes the Stroud District Settlement Role and Function Study which identifies the settlements in question as being Tier 2 settlements.</p>
<p>SA focussed consultation rep 28</p> <p>Frampton on Severn Parish Council</p>	<p>It is useful to summarise the issues in a graphic form. However, much of this is an attempt to attribute quantitative values to a qualitative assessment, some of which is based on speculation. The basis of a sustainability assessment seems to be a drive to allocate development close to existing employment and service opportunities in the assumption that the residents will then use local services and get local jobs rather than travelling elsewhere. Whilst this might be true in terms of some services (e.g. schools, pubs) is there any evidence that it is true in terms of employment or all services? How many people who have moved to the west of Stonehouse actually work in Stonehouse? If they travel to Stroud, Gloucester etc. do they do so on a bus? If it is not true then the argument against dispersal could also be made against new large settlements as well. There is also an assumption that employment will develop close to large new settlements. Where is the evidence for this? Is there any evidence that creating large settlements with access to transport triggers the residents to take to their bikes and abandon their cars? Is this actually just a highways issue, i.e. to heavily load large roads and preserve small lanes? Are the effects on the district and its smaller communities justifiable, i.e. a concentration of services and transport in large settlements and a service vacuum and poor infrastructure elsewhere? Are all services considered? (E.g. there is no reference to secondary schooling or to sewage disposal, both of significant importance in Frampton and in</p>	<p>All site options have been appraised making use of the SA assumptions in Appendix 4 in this SA Report to ensure a consistent approach. The SA framework sub-objective questions (see Table 2.2 in this report) have been used to inform the appraisal of policy and growth strategy options. The SA Report has recorded more positive effects where sites and growth options would result in development in close proximity to services and facilities and employment opportunities. It is considered more likely that residents would have reduced need to regularly travel longer distances by private vehicle through such as approach, particularly compared to an approach which results in development further away from locations residents need regular access to. It is accepted that the related effects will depend on decision making of individuals, however, this approach gives an indication of the likely outcomes.</p> <p>All site options have been appraised in relation to their proximity to primary schools and secondary schools. Furthermore, the SA Report (see Chapter 5) includes updated commentary on capacity and demands on schools in the plan area and the potential implications of development in this regard. This commentary has been informed by the Gloucestershire County Council's School Places Strategy. The potential impacts of development on water quality in the plan area have been considered through SA objective 11: water quality. The Local Plan includes water policies, the approach of which are</p>

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	Whitminster.) Finally, is the AONB more important than flooding risk or biodiversity and if so, why?	supported by the Environment Agency. The individual SA objectives have not been given an individual weighting.
SA focussed consultation rep 29 Brookthorpe-with-Whaddon Parish Council	So much could be written regarding this 125 page document however it would appear that the conclusions mentioned within this document are similar to the points I have raised in the earlier sections. Namely that a hybrid of option A and C is the most favourable. I also have to agree that development option D would result in overburdening of services in many areas, there would be a negative effect regarding bio and geodiversity and possible increased flood risks where these areas are being considered. The use of brown field sites should be considered far more favourably.	The SA Report has considered the potential benefits of all options for growth in relation to the re-use of brownfield land through SA objective 15: waste. The individual SA objectives have not been given an individual weighting.
SA focussed consultation rep 30 (redacted individual comment)	The carbon footprint of all the larger proposed schemes is completely unacceptable in this area. Also the proposed amount of greenfield sites to be built over is sheer vandalism of the country side.	The SA Report has considered the potential benefits of all options for growth in relation to carbon emissions and the re-use of brownfield land through SA objectives 14: climate change and 15: waste, respectively.
SA focussed consultation rep 31 (redacted individual comment)	It is rather and long and detailed report for the average man in the street to read and digest. I believe locating developments as close as possible to major centres of employment and good road links is important. The question of rail is difficult and cannot be relied upon to justify development because it has a nasty habit of not materialising. Thus, the large northern centres would afford the best compromise supported by intensifying in areas that already have the infrastructure to support communities.	<p>A summary of the SA findings for the options for growth is included at paragraph 1.19 of the SA Report for the Additional Housing Options. A summary of the findings for the new small site options and the new growth point options is presented at paragraph 1.41 and paragraph 1.59, respectively of that SA Report. The conclusions (from paragraph 1.76) provide a synopsis of the findings, drawing out the key points from the appraisal work undertaken.</p> <p>As per the SEA Regulations, a Non-Technical Summary has been presented alongside this SA Report for the Regulation 19 Local Plan, to provide a summary of the key points of the SA Report.</p> <p>The SA Report finds that providing development at the more developed settlements would provide residents with better access to existing service and facilities. This is explicitly considered through SA objective 6: services and facilities which is informed by</p>

Consultee	Summary of comment made	SA Team Response
		the findings of the Stroud District Settlement Role and Function Study.
SA focussed consultation rep 32 Moreton Valence Parish Council	We believe sustainability does not mean covering acre after acre of green fields with houses. This area needs proper planned development to retain the character of the district and not be looking for easy options and destroying our heritage. There should be carefully planned dispersal of new housing according to our needs with infrastructure put in place beforehand to cope with increased development. All this development in the countryside must come after each and every brownfield site is exhausted even if this proves to be a more expensive option. Once fields are built on there is no going back and the countryside should be saved for everyone to enjoy, it's not only for those who live there.	The SA Report has considered the potential benefits of all options for growth in relation to the re-use of brownfield land through SA objective 15: waste. The SA Report has also considered the impacts of development in relation to landscape and character (including the historic environment) through SA objectives 8: landscapes/townscapes and 9: historic environment, respectively.
SA focussed consultation rep 33 (redacted individual comment)	Decimating the countryside is detrimental to every single person. Increasing the need for people to drive everywhere is detrimental to the entire planet. Housing needs should be looked at and dealt with in an hierarchical way using brownfield sites and dispersing developments where there is adequate infrastructure to deal with it.	The SA Report has considered the potential benefits of all options for growth in relation to the re-use of brownfield land through SA objective 15: waste. The SA Report has considered the potential for new development to provide residents with access to services and facilities through SA objective 6: services and facilities which is informed by the findings of the Stroud District Settlement Role and Function Study.
SA focussed consultation rep 34 (redacted individual comment)	I do not see that the Sustainability Appraisal has taken into account the importance of the environment around the village.	Comment noted. Unclear what village is being referred to. However, all site options and growth strategy options have been appraised in relation to potential impacts on biodiversity and landscape which comprise important parts of the natural environment, through SA objectives 7: biodiversity/geodiversity and 6: landscapes/townscapes, respectively.
SA focussed consultation rep 35 Wanswell Court Farm	Broadly supportive	Comment noted – no implications for SA.

Consultee	Summary of comment made	SA Team Response
SA focussed consultation rep 36 (redacted individual comment)	My concerns are around minimising environmental impact, especially in terms of having to build new roads. Sustainable development around possible new stations on the Bristol to Gloucester line makes more sense. As far as roads are concerned please utilise existing transport corridors where at all possible	The SA Report has considered the potential benefits of all options for growth in relation to the re-use of brownfield land through SA objective 15: waste. The SA Report has considered the potential for new development to provide residents with access to services and facilities through SA objective 6: services and facilities which is informed by the findings of the Stroud District Settlement Role and Function Study.
SA focussed consultation rep 37 (redacted individual comment)	With reservations I conclude that option A and C appear to be the best idea.	Comment noted – no implications for SA.
SA focussed consultation rep 38 (redacted individual comment)	The Sustainability Appraisal shows the new settlement options at Whitminster and Hardwicke/Moreton Valence in the Severn Vale to be at least equally sustainable as those at Sharpness and Wisloe, which are in the current plan. However, many of the assertions regarding Sharpness seem to assume that infrastructure, new services and facilities, and adequate employment will all come forward in a timely manner to match the housing provision. In reality, it is often the case that the provision of infrastructure for transport, education, health etc lags considerably behind housing provision in large-scale developments like this, if it is delivered at all. Given the isolated location of Sharpness, (as noted often in the SA), relative to the newly proposed settlements in the Severn Vale, its sustainability is relatively poor.	The SA Report, in its appraisal of the five initial strategic growth options considered for the Stroud Local Plan, identified that in relation to SA objective 6: services and facilities: “Those new residents at the new growth point to the south of Sharpness would not be provided with immediate access to a high level of existing services and facilities. However, it is expected that the level of development at each growth point to be delivered would support compact, mixed-use development and the delivery of new services and facilities through S106/CIL funding.” The justification text implies that residents at these locations would have more limited access to services and facilities in the short term as the consultee has highlighted. The effects recorded for Options 3, 4 and 5 (of strategic growth options initially considered for the Stroud Local Plan Review) which would include large growth points is mixed in relation to this SA objective. The mixed effect reflects the potential for new residents to lack access to services and facilities in the short term.
SA focussed consultation rep 39	There are a great many assumptions based on speculation on what future infrastructure and employment might look like which is unfounded. Houses need to be built near to employment centres	The SA Report for the Additional Housing Options considered two larger ‘growth point’ site options (WHI014/PGP1 and HAR006-HAR009 and HAR015-HAR016/PGP2). For these site options the SA reflected the best available information provided to the Council

Consultee	Summary of comment made	SA Team Response
(redacted individual comment)	with access to good transport. To put houses in before these exist is environmentally and socially irresponsible.	regarding the expected types of development to be delivered at those sites. Where sites would provide employment land this is reflected through the appraisal of SA objective 16: employment and 17: economic growth. This approach accounts for the contribution this type of development is likely to make in terms of access to jobs and supporting inward investment. Where sites would not include employment development the appraisal of SA objective reflects the proximity of new homes at the site to employment sites and higher tier settlements at which jobs might be accessed.
Rep ref 40 Sarah Summers Illustration	As a lay person I found The Sustainability Appraisal difficult to understand. Please simplify and make it less technical. Basically, I object to the growth point at Sharpness. The other growth points further north along the A38 are more suited for development due to being accessible to Gloucester and Cheltenham, where there are more job opportunities and the transport links are already in place. Berkeley and Sharpness have very little in the way of job opportunities, minimal transport links and infrastructure.	<p>A summary of the SA findings for the options for growth is included at paragraph 1.19 of the SA Report for the Additional Housing Options. A summary of the findings for the new small site options and the new growth point options is presented at paragraph 1.41 and paragraph 1.59, respectively of that SA Report. The conclusions (from paragraph 1.76) provide a synopsis of the findings, drawing out the key points from the appraisal work undertaken.</p> <p>As per the SEA Regulations, a Non-Technical Summary has been presented alongside this SA Report for the Regulation 19 Local Plan, to provide a summary of the key points of the SA Report.</p> <p>The SA Report for the Additional Housing Options highlights the potential advantages of grow points along the northern portion of the A38 and their potential to support access to South Gloucester fringe (please see from paragraph 1.82 of that SA Report).</p>
SA focussed consultation rep 41 (redacted individual comment)	<p>You will see from my comments that my issue is with how Infrastructure is provided to accommodate any development.</p> <p>How can you have a local planning application for development refused on Highways grounds and then Propose developments of some 2,700 dwellings and a school and shops?</p> <p>Planning was refused some ten years ago following adverse comments from the Highways Authority e.g. 'Therefore, the operations proposed would have significant impacts upon the traffic flow on the main Stroud Road (A4173), that would be detrimental to the safety of other highway users. Contrary to Policy G5'</p>	Comment noted – does not relate to the findings of the SA Report or how these have been derived.

Consultee	Summary of comment made	SA Team Response
<p>SA focussed consultation rep 42</p> <p>(redacted individual comment)</p>	<p>This document was too difficult to understand. I would suggest a clearer version is produced so that it can be fully understood by people who don't work in planning or development.</p>	<p>A summary of the SA findings for the options for growth is included at paragraph 1.19 of the SA Report for the Additional Housing Options. A summary of the findings for the new small site options and the new growth point options is presented at paragraph 1.41 and paragraph 1.59, respectively of that SA Report. The conclusions (from paragraph 1.76) provide a synopsis of the findings, drawing out the key points from the appraisal work undertaken.</p> <p>As per the SEA Regulations, a Non-Technical Summary has been presented alongside this SA Report for the Regulation 19 Local Plan, to provide a summary of the key points of the SA Report.</p>
<p>SA focussed consultation rep 43</p> <p>(redacted individual comment)</p>	<p>This is too lengthy and complex a document for most normal residents to absorb. My only comment would be that the site at Sharpness is completely unsuitable and the proposal needs to be reconsidered.</p> <p>Please can you ensure that documentation is appropriate for the audience, which tends to be busy local residents who want to preserve their lovely community. An Executive Summary would be more appropriate.</p>	<p>A summary of the SA findings for the options for growth is included at paragraph 1.19 of the SA Report for the Additional Housing Options. A summary of the findings for the new small site options and the new growth point options is presented at paragraph 1.41 and paragraph 1.59, respectively of that SA Report. The conclusions (from paragraph 1.76) provide a synopsis of the findings, drawing out the key points from the appraisal work undertaken.</p> <p>As per the SEA Regulations, a Non-Technical Summary has been presented alongside this SA Report for the Regulation 19 Local Plan, to provide a summary of the key points of the SA Report.</p>
<p>SA focussed consultation rep 44</p> <p>(redacted individual comment)</p>	<p>I am sad that you have supplied this lengthy document that is not easy to understand. There seems to be an assumption that Sharpness growth will be implemented but it surely has not been proved to be suitable as a growth area due to many factors especially flooding within several decades. I object firmly to Sharpness being put forward for more housing.</p>	<p>A summary of the SA findings for the options for growth is included at paragraph 1.19 of the SA Report for the Additional Housing Options. A summary of the findings for the new small site options and the new growth point options is presented at paragraph 1.41 and paragraph 1.59, respectively of that SA Report. The conclusions (from paragraph 1.76) provide a synopsis of the findings, drawing out the key points from the appraisal work undertaken.</p> <p>The SA Report for the Additional Housing Options considered options for growth strategy for Stroud. At the time no decision had been made on which strategy would be taken forward. Of the options considered initially, Option3, Option 4 and Option 5 (the hybrid option) included development at Sharpness. Options A to D (the additional strategic growth options) represent a variation of the</p>

Consultee	Summary of comment made	SA Team Response
		<p>hybrid option to accommodate the potential additional housing need in the District.</p> <p>In relation to the Sharpness site, included in the hybrid option, the appraisal text states that “a high level of new development to the south of Sharpness (would occur) however this area would likely avoid the significant areas of Flood Zone 2 and 3 present by the River Severn”. The development of large scale growth points would also involve the development of large amounts of greenfield land at focussed locations which could have implications for surface water flooding considering the proliferation of impermeable surfaces. This is reflected in the significant negative effect recorded for the hybrid option in relation to SA objective 12: flooding as part of an overall mixed effect.</p>
<p>SA focussed consultation rep 45</p> <p>Millar Howard Workshop</p>	<p>I clicked the 'finish survey' button by mistake when I filled in my return. So comments now here.</p> <p>Whilst the appraisal is very thorough, and has much to commend, it seems to be what is outside of the scope that is important. An appraisal based upon this set of criteria will almost inevitably conclude that large volumes of housing grouped together by a motorway (new node points) are the answer. This will however continue to create more of the same monotonous suburbia, reliant upon cars, with slim sense of community/ mutual obligation, and detached from nature, that we have been bashing out for 50+ years. I find it a rather depressing endorsement of the status quo. I applaud the emerging local plan for including policies that consider in more detail the types of housing that we should be building, and especially policies on self and custom build, and on community lead housing, where the people with long term interests in the quality, sustainability, and vitality of their places have a much greater say in the decision making.... rather than just big promoters and housebuilders, continuing to bash out the same 'just about good enough' homes.</p>	<p>The SA Report highlights the benefits of a more balanced approach where new growth points and development in line with the settlement hierarchy are both taken forward. The appraisal of the individual policies included in the Local Plan are also appraised in this SA Report.</p> <p>The SA appraisals of policies, sites and their reasonable alternatives have been undertaken in line with the agreed SA framework and with regard for the associated assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted upon at previous iterations of the SA Report (i.e. at the Regulation 18 and Scoping stages). These reflect the key sustainability issues which have been identified for Stroud District as presented in Chapter 3 of the SA Report. The methodology used for the SA Report has been set out in Chapter 2. This approach has been taken to ensure consistency and objectivity for the SA findings in relation to sites and policies which have been subject to appraisal.</p>

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<p>SA focussed consultation rep 46 (redacted individual comment)</p>	<p>Gloucester's rural fringe won't exist if it is further developed despite it being easy picking for the Stroud Planners to "dump" more housing here, making the likely traffic and amenities problem either Gloucestershire County or Gloucester City Council's issue rather than Stroud Districts. Happy for the other clusters to take their fair share of housing particularly the Stroud Valleys particularly Woodchester, Minchinhampton, Horsley and Nailsworth where flooding is less likely.</p> <p>Hardwicke has poor and congested A38 access with a severely congested Cross Keys Roundabout even though we have been in lockdown for 9 months, and a poorly designed M5 J12. The land is regularly flooded due to the small amount of soil covering a deep bed of clay."</p>	<p>The sites considered at Hardwicke through the SA Report for the Additional Housing Options (which the consultation was concerned with) are site ref HAR006-HAR009 and HAR015-HAR016/PGP2 (which together form the broad location at Moreton Valence / Hardwicke). Detailed transport assessment work for the individual site options is not for consideration through the SA given its high level and strategic scale. Instead this will be considered as part of the plan preparation process and if individual planning applications come forward as part of the development process. The SA recognises that the site lies mostly outside of flood zones 3a and 3b (although a portion of the central area of the site lies within higher risk flood areas) recording an overall minor negative effect in relation to SA objective 12: flooding.</p>
<p>SA focussed consultation rep 47 (redacted individual comment)</p>	<p>Ill conceived in many aspects</p>	<p>Comment noted – no implications for SA.</p>
<p>SA focussed consultation rep 48 (redacted individual comment)</p>	<p>Everyone needs/wants green recreational spaces, consider making the old partly disused railway line from Sharpness to Berkeley into a multi user track.</p>	<p>Comment noted – no implications for SA.</p>
<p>SA focussed consultation rep 49 (redacted individual comment)</p>	<p>1.) Although travel times by various means are considered within the Appraisal, it is not clear how these are determined - for example, although journey times on foot are considered, it is not clear how these are assessed, and how they may be affected by gradient/topography. This is particularly relevant given the landscape of the Valleys as noted in the report. For many people, even short journeys on foot may be impossible given local steep climbs, and at the least, journey times may be very different</p>	<p>The travel times to services and facilities for the SA objectives have been based on straight line distance calculations to ensure all sites are appraised consistently.</p> <p>The exception to this is the appraisal of site options in relation to SA objective 10: air quality. This portion of the appraisal reflects the work of the SALA Transport Accessibility Assessment. The assessment considered the accessibility of each site option as undertaken by Gloucestershire County Council on behalf of Stroud</p>

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	<p>returning. This may impact on car use, and public transport provision in such areas of course, with a knock-on effect environmentally. (ref. 3.58).</p> <p>2.) Whilst the adoption of 10% of sites as smaller developments might indicate a welcome move to brown field sites, or infill within existing developments, there is a concern that this may lead to pressure on sites within the AONB or in Tier3/4 settlements. Whilst consideration of the AONB is mentioned, no specific recommendations for protection of the AONB are suggested. Although much is made of the need for environmental protection in meeting sustainability requirements, there seem to be "get out" clauses:</p> <p>e.g "1. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area;" (ref. 3.40).</p>	<p>District Council as part of the SALA. This work rated each site option in terms of its accessibility to town/district/local centres, employment sites and services and facilities that people may be required to access on a regular basis. Sites were assessed in terms of accessibility to 14 such features by walking, by car and by bus (including walking journey time to the relevant bus stop). The assessment assigned a score of 1, 2 or 3 to sites for each method of transport where it was located within 15 minutes, between 15-30 minutes or over 30 minutes of each of the 14 features respectively. These scores were then added to given a total score for each site. While it is accepted that levels of access will be influenced by the gradient of roads and paths in the plan area, this level of detail is not on a consistent basis for all sites. The level of detail of the appraisal of sites is considered appropriate for the strategic scale of the SA.</p> <p>The SA is undertaken separately but forms part of the evidence base for the selection of the preferred site allocations and policies included in the Local Plan. The consultee has quoted the SA where it includes reference to the NPPF's presumption in favour of sustainable development. The Local Plan includes policies relating to the protection of the AONB and it is unclear how the latter points of the consultee's comment relate to the SA Report for the Additional Housing Options.</p>
<p>SA focussed consultation rep 50</p> <p>Wotton-under-Edge Town Council</p>	<p>We strongly object to the way in which the proposed distribution of additional housing numbers is being dictated by the algorithm in the Government's White Paper "Planning for the future" which would not put houses where they are most needed, is likely to reduce the quantity of affordable housing being built and would put considerable strain on rural areas. In particular, any proposed additional housing must be accompanied by adequate new infrastructure to make the development sustainable.</p>	<p>The Council's Additional Housing Options' paper considered options for accommodating a higher number of homes in the plan area. This increased number of total homes is in line with the Government's consultation document on proposed changes to the minimum housing requirement for each local authority area in the country. This revised figure has not been taken forward by Government.</p>
<p>SA focussed consultation rep 51</p>	<p>It is disappointing that the report does not make a more adequate assessment of SA08 Biodiversity and Geodiversity, as evidenced in all of the summary tables presented. It is acknowledged that a reliable assessment is not possible until specific locations and</p>	<p>SA objective 7: biodiversity/geodiversity presents an appraisal of the site options in relation to impacts on biodiversity and geodiversity for the Additional Housing Options consultation and all other stages of plan making. Given the strategic scale of the SA and</p>

Consultee	Summary of comment made	SA Team Response
<p>Gloucestershire Wildlife Trust</p>	<p>designs are known, however, a better assessment was possible with the data and expertise available in the county. GWT were not consulted as part of this work and to our knowledge neither was the Gloucestershire Centre for Environmental Records. The assessment appears to have been largely based on proximity to designated biodiversity sites. Whilst this is an important consideration, it oversimplifies the challenges of the ecological emergency and doesn't properly consider connectivity and habitat viability issues. Biodiversity underpins natural capital and ecosystem services, so it should be integral to any sustainability appraisal. This has led to shortcomings throughout the appraisal report, some examples of which are provided below.</p> <p>There is an assumption that option A would limit greenfield land take and therefore, limit impacts on biodiversity. This makes an assumption the development can only have negative impacts on biodiversity. Development on land of low wildlife value that delivers Biodiversity Net Gain, could lead to enhancements for the Nature Recovery Network. The opportunity for development on greenfield to deliver positive impacts on biodiversity has not been considered. This issue is repeated throughout the report.</p> <p>The lack of assessment of species data is reflected in the conclusions drawn. Both proposed growth points, particularly PGP2, have a large number of records of nationally threatened birds. Whilst this does not necessary prevent development, it must be a consideration when assessing the sustainability of prospective growth points.</p> <p>Appendix 3</p> <p>It is the view of GWT that there is insufficient evidence presented within the report to draw the conclusions made in this section regarding the comparative biodiversity impacts of the options. This needs to be reassessed with the additional considerations of the Nature Recovery Network and notable species data.</p>	<p>to ensure that a consistent approach was undertaken for the appraisal of all site options a proximity based approach was used. The greater significance of effects identified for sites in close proximity to national or international biodiversity and geodiversity sites reflects the increased importance of national or internationally designated sites over local sites. The distance to these sites accounts for the potential for increased disturbance and issues of pollution to result where development is located near to these designations. Residential sites within 250m-3km from Rodborough Common SAC or 250m-7.7km from the Severn Estuary SAC/SPA/Ramsar were also identified as have adverse impacts in relation to these sites given the existing zones of recognised recreational impact at these sites. The findings of the HRA have been incorporated in this version of the SA Report to ensure the effects relating to international sites are appropriate reported on. The appraisal of the options for the growth strategy considers the potential for the design of new development to support opportunities for the design of new development to include the retention or creation of green infrastructure. This is detailed in the matrices for the options for the growth strategy and is reflected in the uncertain effect recorded for each of these options.</p>

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<p>SA focussed consultation rep 52</p> <p>(redacted individual comment)</p>	<p>The appendices don't display properly on the screen and cannot be read. It's a rather longwinded way of saying what's obvious that a hybrid approach offers the most potential.</p>	<p>A summary of the SA findings for the options for growth is included at paragraph 1.19 of the SA Report for the Additional Housing Options. A summary of the findings for the new small site options and the new growth point options is presented at paragraph 1.41 and paragraph 1.59, respectively of that SA Report. The conclusions (from paragraph 1.76) provide a synopsis of the findings, drawing out the key points from the appraisal work undertaken.</p> <p>As per the SEA Regulations, a Non-Technical Summary has been presented alongside this SA Report for the Regulation 19 Local Plan, to provide a summary of the key points of the SA Report.</p>
<p>SA focussed consultation rep 53</p> <p>Hawkins Watton Ltd</p>	<p>Page 32 Figure 2.10 illustrates well the sustainable nature of Stroud and Stonehouse. Interestingly Sharpness, Wisloe and to a lesser extent Cam are not well served.</p> <p>I am intrigued how one box is supposed to give "the public" the opportunity to comment upon of a document running to 74 pages plus while your own Consultation Document runs to less than 20 pages with ample space with this Questionnaire to comment in brief on the main issues.</p> <p>I will draw to your attention to paragraph 3.13 first bullet point which seems to be in total accord with the Comments provided by me within this response.</p>	<p>A summary of the SA findings for the options for growth is included at paragraph 1.19 of the SA Report for the Additional Housing Options. A summary of the findings for the new small site options and the new growth point options is presented at paragraph 1.41 and paragraph 1.59, respectively of that SA Report. The conclusions (from paragraph 1.76) provide a synopsis of the findings, drawing out the key points from the appraisal work undertaken.</p> <p>As per the SEA Regulations, a Non-Technical Summary has been presented alongside this SA Report for the Regulation 19 Local Plan, to provide a summary of the key points of the SA Report.</p>
<p>SA focussed consultation rep 54</p> <p>(redacted individual comment)</p>	<p>Too impenetrable for the lay reader. There seems to be an underlying assumption that the growth point at Sharpness will go ahead which is unsupported by the evidence and to which I strongly object. A non-technical summary would have been helpful.</p>	<p>A summary of the SA findings for the options for growth is included at paragraph 1.19 of the SA Report for the Additional Housing Options. A summary of the findings for the new small site options and the new growth point options is presented at paragraph 1.41 and paragraph 1.59, respectively of that SA Report. The conclusions (from paragraph 1.76) provide a synopsis of the findings, drawing out the key points from the appraisal work undertaken.</p> <p>As per the SEA Regulations, a Non-Technical Summary has been presented alongside this SA Report for the Regulation 19 Local Plan, to provide a summary of the key points of the SA Report.</p>

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<p>SA focussed consultation rep 55 (redacted individual comment)</p>	<p>"I have not read this but think that:</p> <p>1) all new houses must be built to standards that match with SDC's declaration of a climate emergency - i.e. that must have the highest energy rating. New forms of energy generation must be explored. If the councils do not hold developers to high sustainable standards the builders will get away with sub-standard energy buildings. Solar panels, ground source energy etc, highest insulation ratings.</p> <p>2) the principle of housing being built near to existing transport hubs and infrastructure should be paramount to decisions about where to locate housing. Minimize the extra roads. Create communities, not large estates with no support for families, the elderly etc"</p>	<p>Comment noted – no implications for SA.</p>
<p>SA focussed consultation rep 56 (redacted individual comment)</p>	<p>Option A, B and D should be considered, page 5 in the Sustainability Appraisal.</p> <p>Option C, new growth points along traffic corridors should not be considered, especially near junctions, 12 and 13.</p> <p>There is already massive housing development happening and planned in this area. Why should this continually lose its green corridors and traffic already queues on the M5 to exit at busy times at these 2 junctions.</p> <p>More housing close to these junctions will just increase this very, very dangerous situation, the infrastructure cannot take it - it will not be sustainable.</p> <p>This is why housing needs to be dispersed around the district and not just building new massive growth points next to other massive growth points, just because it's the 'easy' option.</p>	<p>The Council has considered all options for the growth strategy for the plan area that are set out in the SA work for the Additional Housing Options. The reasons for the decision making the Council reflect this appraisal work and other evidence base documents and are presented in Appendix 9 of this SA Report.</p> <p>The SA has identified that is possible to achieve benefits in terms of securing high levels of access to existing services and facilities close to the larger settlements. Options A (intensifying remaining sites), C2 (A419) and C3 (A4135) in particular could help to achieve these benefits in comparison to the original hybrid option (Option 5) for the growth strategy, as well as Options B (dispersal to Tier 2 and 3 settlements) and D (wider dispersal). By dispersing a large proportion of development to a higher number of smaller settlements, Option D is unlikely to result in a high proportion of new residents having good access to a range of existing services and facilities. Pursuing a more dispersed distribution of development is also considered less likely to support new service provision in the District.</p>
<p>SA focussed consultation rep 57</p>	<p>A masterpiece of cut and paste.</p> <p>It makes assumptions which the subsequent events of 2020 have undermined. Much of it needs to be rethought through to take</p>	<p>It is assumed that consultee is making reference to the effects of COVID-19 on the economy, commuting and the potential increase in working from home. It is accepted that changes have resulted in residents' normal day-to-day activities, however, it is too early to</p>

Consultee	Summary of comment made	SA Team Response
(redacted individual comment)	<p>account of people working from home and the rise in the use of online services.</p> <p>It relies on data which are out of date.</p>	<p>tell if these changes will be sustained in the long term. As further evidence emerges in relation to these topics this will be reflected in the SA work.</p>
<p>SA focussed consultation rep 58</p> <p>(redacted individual comment)</p>	<p>The Sustainability Appraisal is a long document that is difficult to read and is too impenetrable for the lay reader. There seems to be an underlying assumption that the growth point at Sharpness will go ahead which is unsupported by the evidence and to which I strongly object. A non-technical summary would have been helpful.</p> <p>Having said that the Sustainability Appraisal shows the new settlement options at Whitminster and Hardwicke/Moreton Valence in the Severn Vale to be at least equally sustainable as those at Sharpness and Wisloe. However, many of the assertions, (which I do not necessarily agree with), regarding Sharpness for example, seem to assume that infrastructure, new services and facilities and adequate employment will all come forward in a timely manner to match the housing provision. That is not the experience I have seen in the delivery of large housing sites, where often the provision of infrastructure for transport, education, health etc lags considerably behind housing provision, if delivered at all, leading to poor sustainability of developments. Given the isolated location of Sharpness, (as noted often in the SA), relative to the newly proposed settlements at Hardwicke and Whitminster in the Severn Vale, its sustainability is relatively poor.</p>	<p>The SA Report, in its appraisal of the five initial strategic growth options considered for the Stroud Local Plan, identified that in relation to SA objective 6: services and facilities:</p> <p>“Those new residents at the new growth point to the south of Sharpness would not be provided with immediate access to a high level of existing services and facilities. However, it is expected that the level of development at each growth point to be delivered would support compact, mixed-use development and the delivery of new services and facilities through S106/CIL funding.” The justification text implies that residents at these locations would have more limited access to services and facilities in the short term as the consultee has highlighted. The effects recorded for Options 3, 4 and 5 (of strategic growth options initially considered for the Stroud Local Plan Review) which would include large growth points is mixed in relation to this SA objective. The mixed effect reflects the potential for new residents to lack access to services and facilities in the short term.</p>
<p>SA focussed consultation rep 59</p> <p>Standish Parish Council</p>	<p>The work and detail in the Sustainability Appraisal is admirable, However, as it makes clear that, in various areas, impacts cannot be assessed until plans are more detailed, we reserve further comment at this stage.</p>	<p>Comment noted – no implications for SA.</p>
<p>SA focussed consultation rep 60</p>	<p>The Sustainability Appraisal is difficult to read and is a very long document that is not user friendly to a lay reader.</p> <p>There does seem to be an underlying assumption that the growth point at Sharpness will go ahead despite it being unsupported by</p>	<p>The SA Report, in its appraisal of the five initial strategic growth options considered for the Stroud Local Plan, identified that in relation to SA objective 6: services and facilities:</p>

Consultee	Summary of comment made	SA Team Response
(redacted individual comment)	<p>the evidence. This site is remote and distant from employment, and lacks community facilities and services. Consequently, I strongly object to this site.</p> <p>A non-technical summary to accompany the SA would have been helpful.</p>	<p>“Those new residents at the new growth point to the south of Sharpness would not be provided with immediate access to a high level of existing services and facilities. However, it is expected that the level of development at each growth point to be delivered would support compact, mixed-use development and the delivery of new services and facilities through S106/CIL funding.” The justification text implies that residents at these locations would have more limited access to services and facilities in the short term as the consultee has highlighted. The effects recorded for Options 3, 4 and 5 (of strategic growth options initially considered for the Stroud Local Plan Review) which would include large growth points is mixed in relation to this SA objective. The mixed effect reflects the potential for new residents to lack access to services and facilities in the short term.</p> <p>A summary of the SA findings for the options for growth is included at paragraph 1.19 of the SA Report for the Additional Housing Options. A summary of the findings for the new small site options and the new growth point options is presented at paragraph 1.41 and paragraph 1.59, respectively of that SA Report. The conclusions (from paragraph 1.76) provide a synopsis of the findings, drawing out the key points from the appraisal work undertaken.</p> <p>As per the SEA Regulations, a Non-Technical Summary has been presented alongside this SA Report for the Regulation 19 Local Plan, to provide a summary of the key points of the SA Report.</p>
<p>SA focussed consultation rep 61</p> <p>(redacted individual comment)</p>	<p>The A419 is the most sustainable of the three options which supports PGP1 (Whitminster) site being included in this local plan. Close to employment, infrastructure, no constraints to development.</p> <p>The A38 is less sustainable. However, PGP2 (Moreton Valence) has the additional benefit of being close to the least congested M5 junction, close to employment and infrastructure and parts of the site are brownfield.</p> <p>The A4135 is the least sustainable of the three options which supports the removal of PS37 from this local plan is has significant infrastructure constraints, coalesces with villages and hamlets in</p>	<p>The SA has identified that is possible to achieve benefits in terms of securing high levels of access to existing services and facilities close to the larger settlements. It has been reported through this work that Options C2 (A419) and C3 (A4135) in particular could help to achieve these benefits in comparison to the original hybrid option (Option 5) for the growth strategy, as well as Options B (dispersal to Tier 2 and 3 settlements) and D (wider dispersal). Option C1 (A38) performs slightly less favourably than the other two sub options considering that many of the settlements along this route (including Stone, Cambridge, Newport and Whitminster) are presently less developed and provide access to a lower number of services and facilities and jobs. The effects recorded for this option</p>

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	<p>the Slimbridge Parish and Cam (& therefore Dursley), noise and pollution issues which cannot be resolved, the impact to loss of open spaces which waders use as a roosting and possibly breeding location, the loss of the Best and Most Versatile land in the District (CN2030 & NPPF para 170).</p> <p>All proposed sites should be assessed and compared prior to a decision being made to select only the most suitable, sustainable, viable and deliverable ones to go forward to ensure a sound local plan is submitted to the Planning Inspectorate. PS37 should be removed from the local plan.</p>	<p>also reflect the strategic road access (including the M5) from this area towards Gloucester and Bristol which, when considered in combination with the lower existing job provision in the area, could promote some out commuting. However, the existing strategic road access could also help make the area more attractive to inward economic investment and therefore this option performs strongly in this regard.</p> <p>All sites considered to be reasonable alternatives by the Council have been tested through the SA. The SA forms part of the evidence base which has informed the selection of the sites for allocation. The reasons for the Council's selection of the site allocations is included in Appendix 9 of this SA Report.</p>
<p>SA focussed consultation rep 62 (redacted individual comment)</p>	<p>The new Additional Growth Points in this consultation are sustainable and should be included in this local plan.</p>	<p>Comment noted – no implications for SA.</p>
<p>SA focussed consultation rep 63 (redacted individual comment)</p>	<p>The sustainability appraisal needs to take into account the economic impact of COVID-19 and the likelihood of industry and commerce capitalising on the areas while also the impacts of highways improvements, transport and social care provision in these areas in the context of other developments already approved since the plan was generated.</p>	<p>The consultee makes reference to the effects of COVID-19 on the economy, commuting and the potential increase in working from home. It is accepted that as a result of the impacts of COVID-19, changes have resulted in residents' normal day-to-day activities. However, it is too early to tell if these changes will be sustained in the long term. As further evidence emerges in relation to these topics this will be reflected in the SA work.</p> <p>The cumulative impacts of the plan have considered major committed sites and sites under construction (see Chapter 6 of this SA Report).</p>
<p>SA focussed consultation rep 64</p>	<p>Haven't seen this, so cannot comment on it at the moment. I actually doubt that I would support or trust any of the findings in an appraisal that is trying to find a way to justify the destruction of countryside and village living by attempting to mitigate the horror of it all.</p>	<p>Comment noted – no implications for SA.</p>

Consultee	Summary of comment made	SA Team Response
(redacted individual comment)		
SA focussed consultation rep 65 (redacted individual comment)	SA notes that A419 option is most sustainable. Some of the marking is incorrect, possibly due to lack of local knowledge - e.g. flooding.	The SA appraised the option of providing further development along the A419 as Option C2. The SA did not simply conclude that development at the A419 would be the most sustainable. It concluded that using elements of Option A would achieve benefits associated with higher densities of development and more efficient land use. However, considering that it would be difficult to achieve the required level of housing through this option alone, a large scale growth point along the A38 (Option C1) or A419 (Option C2) might also be pursued. This could secure substantial new infrastructure provision, affordable housing and promote inward investment as well as delivering the required level of housing development. Furthermore, development at the A38 may prove particularly attractive to potential investment given its access to the M5. The conclusions also highlighted the potential for adverse issues if Option C1 was taken forward in relation to the existing high volumes of traffic and constraints posed by the high level of development along much of its route.
SA focussed consultation rep 66 (redacted individual comment)	Main comment is that it quite often says that full investigations have not been carried out. Perhaps they should be if you are going to suggest random sites.	The SA has been informed by evidence base documents available at the time of preparation. As the evidence base has been updated this has informed the findings for individual site options and options for the growth strategy. This has included emerging evidence from the SALA accessibility assessment and landscape capacity evidence. The findings for site options included in this SA Report reflect the most up to date evidence available.
SA focussed consultation rep 67 (redacted individual comment)	A full evaluation and comparison should be conducted prior to any sites being included in the local plan.	This SA Report includes an appraisal of all sites considered as reasonable alternatives for the Local Plan. Separate to this the Council has been undertaking its SALA assessment work which has also been used to inform its selection of site allocations.

Consultee	Summary of comment made	SA Team Response
<p>SA focussed consultation rep 68</p> <p>Kingswood Parish Council</p>	<p>The Parish Council advised that they will not be submitting any further comments at this stage.</p>	<p>Comment noted – no implications for SA.</p>
<p>SA focussed consultation rep 69</p> <p>National Trust</p>	<p>"We have not assessed the Sustainability Appraisal in any detail but note the reference to "Land at Haresfield Playing Field" (HFD013). It is stated in the Appraisal that development of this site would involve the loss of greenspace and have a "significant negative effect" in relation to biodiversity. Given the proximity of Haresfield village to Haresfield Beacon (NT), we would ask that our comments under question 9 of this questionnaire (relating principally to the two proposed growth areas west of the M5) are taken into account when conclusions are drawn in relation to Land at Haresfield Playing Field (see below):</p> <p>General comment (people pressure and ecology):</p> <p>In our January 2020 response, we noted that "Haresfield Beacon and Standish Woods are experiencing a significant increase in visitor numbers, and additional house building in proximity to these places could exacerbate these issues". These visitor pressures have been pronounced during the Coronavirus pandemic in 2020.</p> <p>As an example, 'people pressure' has been particularly challenging at Haresfield Beacon (which is one of the nearest sites to the two proposed growth areas in the Severn vale). Haresfield Beacon is accessed through the village of Haresfield up a narrow, steep lane which in itself is causing problems of traffic management. There are also challenges for highway safety and farm and landowner access. Whilst Haresfield Beacon is not a designated nature conservation site, there have been conversations about it potentially forming part of a National Nature Reserve in the future.</p> <p>In light of the above, should the Council progress one or both of the growth areas (and we respect the fact that the new housing as to go somewhere), we would want to see detailed consideration of the</p>	<p>The SA Report for Additional Housing Options consultation reported a significant negative effect for site option HFD013 given that a protected outdoor playspace lies within its boundaries. The development of the site could therefore result in impacts on the green infrastructure network in the area. The appraisal of SA objective 7: biodiversity/geodiversity and all other SA objectives has been undertaken in line with the SA assumptions in Appendix 4 of this SA Report. This approach has been taken to ensure consistency between the large number of sites considered. If further evidence becomes available in relation to the designation of Haresfield Beacon as a National Nature Reserve this will be reflected in the appraisal of the site. More detailed consideration of the potential for increased visitor numbers are outside of the scope of the SA given its strategic scale and the inability to afford this level of consideration to all site options. This type of assessment is more appropriate for future planning of the site and as part of the planning application stage.</p> <p>The appraisal of site WHI014/PGP1 and HAR006-HAR009 and HAR015-HAR016 (PGP2) considered potential impacts on landscape character including that of the AONB. This reflected the findings of the Council's landscape sensitivity work in the SA Report for the Additional Housing Options consultation as well as the proximity of both sites to the AONB. Neither site lies within 500m of the AONB boundary. However, for site WHI014/PGP1 a significant negative effect was recorded in relation to SA objective 8: landscapes/townscapes given that a large proportion of the site is in an area which was rated as being of high/medium sensitivity to residential development and being of medium sensitivity to employment development. As site HAR006-HAR009 and HAR015-</p>

Consultee	Summary of comment made	SA Team Response
	<p>natural environment implications. This may need to include survey work to identify existing visitor trends and pressures to nearby sites such as Haresfield Beacon. It should certainly include the provision of ample and attractive public greenspace within any new growth area/s. It is worth noting that this is highly unlikely to oblivate the 'draw' of sites in the Cotswolds for visitors wanting anything from a short walk to a viewpoint to technical mountain biking. Further measures may be needed therefore, in order to manage and moderate visitor pressures.</p> <p>Lastly, we would encourage the Council and developers to be proactive about incorporating biodiversity net gain in the new growth area/s (and across the District), and in the use of technical standards such as Building With Nature to improve the quality and the environment of new built developments.</p> <p>General comment (landscape and visual):</p> <p>From the Cotswolds AONB escarpment, there are many viewpoints with wide ranging views in a generally westerly direction, and this includes from the Trust's land at Haresfield Beacon and the Topograph viewpoint. Whilst we accept that the Council has a challenging role in finding locations for new housing in the District, there is an increasing risk of urbanisation adversely affecting the views and setting of the Cotswolds.</p> <p>Should one or both of the growth areas be progressed, there could be significant landscape and visual impacts from the viewpoints in the Cotswolds AONB. We would want the potential impacts (and mitigation measures) to be fully considered. We would also advocate for compact built development – so for example, it might be less desirable for any Whitminster growth area to extend to its full northern extent as indicated. We also feel that there would be a very strong case for large amounts of tree planting in the new growth area/s, both to provide a significant buffer on the eastern side, and to have trees interdispersed within the development area. This should – over time as the trees get established – help to screen and soften the effects on views from the Cotswolds. This</p>	<p>HAR016 (PGP2) was not covered by that report, the effect was recorded as uncertain through the SA Report for the Additional Housing Options consultation. The effect recorded for this site in relation to SA objective 8 has now been updated in this SA Report to reflect the landscape findings of the Gloucestershire Growth Options Report.</p>

Consultee	Summary of comment made	SA Team Response
	kind of substantive new tree planting would also help with carbon capture and tackling climate change. "	
SA focussed consultation rep 70 (redacted individual comment)	Please protect the countryside of the Berkeley Vale from urbanisation at a time when brownfield sites are becoming available in urban areas. That reduces CO2 emissions by placing homes near jobs and facilities, saves green spaces for farming, tourism, urban cyclists and walkers and encourages visitors from abroad who help our local economy. Building along the A38 and Sharpness would do the opposite. Please do not allow our towns and cities to become areas with decaying empty shops and offices. There is a solution...well designed work from home terraced housing in our cities with cycle routes between the towns and tourist areas along the canal.	The SA has identified that it is possible to achieve benefits in terms of securing high levels of access to existing services and facilities close to the larger settlements. Options A (intensifying remaining sites), C2 (A419) and C3 (A4135) in particular could help to achieve these benefits in comparison to the original hybrid option (Option 5) for the growth strategy, as well as Options B (dispersal to Tier 2 and 3 settlements) and D (wider dispersal). In the summary of effects Table 2 in the SA Report on the Additional Housing Options, Options C2 and C3 performed more favourably than Option C1 (A38) in relation to SA objectives 6: services and facilities and 12: climate change and comparably or more favourably in relation to SA objectives 13: efficient land use and 16: employment. This reflects the consultee comments in relation to these options.
SA focussed consultation rep 71 (redacted individual comment)	The plan doesn't mention any secondary education schools that would be needed to accommodate a large new population (and serve the existing population). The surface flooding impacts are underestimated based on how waterlogged these areas are at the moment. It is not clear on what services would be provided and whether they would offer anything above the existing facilities in neighbouring areas. It doesn't reflect the impact on other areas that would see their usage diminish if people were to use these new local centres.	The SA Report (see Chapter 5) includes updated commentary on capacity and demands on schools in the plan area and the potential implications of development in this regard. This commentary has been informed by the Gloucestershire County Council's School Places Strategy. The findings of the SA Report in relation to flood risk (SA objective 12) has been informed by the location of areas of flood zone 3a and 3b in the District. It also reflects the potential for loss of greenfield land which might otherwise allow for the safe infiltration of surface water in the plan area. Where information has been made available to the Council on the expected uses to be provided at site allocations this has informed the appraisal of site options. Evidence relating to impacts on existing centres in the plan area if new centres are to be delivered is not presently available. The strategic scale of the SA means that this information would not be available across all sites options to appraise them in a consistent manner. This level of assessment will be of more relevance as planning for individual site options progresses and for the planning application stage.

Consultee	Summary of comment made	SA Team Response
<p>SA focussed consultation rep 72 (redacted individual comment)</p>	<p>It is wrong to rely in any way on a railway bridge which may never be built and even if it is won't be built for decades.</p> <p>Furthermore, I believe it is very unlikely the bridge will be built. As well as funding difficulties, there are engineering and geographical difficulties due to sea level rises and subsidence on the Lydney side being an issue for the train line on the western bank. Therefore, it is not a suitable location for a backup to the Severn Tunnel. Which leaves the lone function of connecting Dursley to Lydney which is not enough to fund the bridge - there are already equally direct routes to get from those towns to Bristol or Gloucester, for example.</p> <p>On sustainability, I would like to express my full support for the importance of protecting and increasing wild habitats and spaces for wildlife and for inhabitants - sometimes separately. Also for sustainable transport, lifestyles and homes. And the promotion of healthy, active lifestyles including walking and cycling for both leisure and transport. More open, outdoor and wild spaces are needed for hikers and dog walkers etc. The pandemic has really highlighted that. This can be a challenge in the Vale due to the flay clay and extreme muddiness. I would like to see this addressed so the countryside is accessible year round and can cope with much increased numbers.</p>	<p>The SA Report on the Additional Housing Options and this SA Report have considered the potential impacts of the individual site options and growth strategy options in relation to health, biodiversity and sustainable transport. These effects are reported through the SA against SA objectives 2: health, 7: biodiversity and geodiversity and 10: air quality.</p>
<p>SA focussed consultation rep 73 Chilmark Consulting Ltd</p>	<p>The findings of the SA analysis concerning each of the four options are noted (summarised in Table 2 at page 9 of the SA Report and with supporting text in paragraphs 1.19 – 1.31). The more detailed justification of the options against each SA objective is also noted. CSL have some concerns that there is an inherent 'optimism bias' in terms of the high level nature of the SA appraisal of the four options which rests heavily on an approach that considers focusing large levels of development to a small number of large settlements sites to be the most sustainable as they are purported to be able to provide sufficient infrastructure; and that smaller settlements are, conversely, unable to deliver services, infrastructure or access to employment.</p>	<p>The SA has identified that is possible to achieve benefits in terms of securing high levels of access to existing services and facilities close to the larger settlements. Options A (intensifying remaining sites), C2 (A419) and C3 (A4135) in particular could help to achieve these benefits in comparison to the original hybrid option (Option 5) for the growth strategy, as well as Options B (dispersal to Tier 2 and 3 settlements) and D (wider dispersal). The SA does not conclude that smaller settlements are unable to deliver services, infrastructure or access to employment. The smaller settlements provide more limited access to existing provisions of this nature, however, it is the scale of new development that the SA Report highlights will be most influential in the scale of new provisions that will be supported. New service provision is considered most likely to</p>

Consultee	Summary of comment made	SA Team Response
	<p>This approach in the SA fails to reflect the importance of ensuring that future growth adequately supports rural and smaller settlement vitality and viability reducing the potential for stagnation of these places.</p> <p>It is also an approach which fails to adequately consider the relative importance or significance of different SA indicators / measures, and fails to consider effectively the magnitude of potential environmental effects arising from development.</p> <p>Put simply there is a lack of balance as to the importance or magnitude of the various possible effects arising. There is also a lack of acknowledgement, other than very superficially, that the underlying environmental, infrastructure capacity and sustainability conditions are very different across the individual Tier 2 (and other lower tier 3) settlements.</p> <p>Finally, the SA's optimism bias towards larger settlements inherently rests of the ability of larger new development or growth to provide the necessary infrastructure to ensure it is sustainable. CSL are concerned (as set out in previous representations) that larger scale development often requires the development of costly new infrastructure and that both the lead times and development build-out rates resulting are not, in reality, able to secure the infrastructure necessary or to adequately improve existing facilities. It is therefore why CSL supports a more balanced spatial growth approach that also allows smaller sites in lower tier settlements (such as Painswick) to come forward in the shorter term while larger-scale developments involving very substantial extensions / new settlements are programmed for longer term growth.</p> <p>The Plan and the SA therefore need to give closer consideration to this rather than a rather simplistic, superficial and biased analysis that bluntly supports larger settlement growth and a significant reliance on new and expanded infrastructure to mitigate the inevitable environmental effects.</p>	<p>be supported where high levels of development are provided at concentrated locations given the potential to secure developer contributions and increased likelihood of such sites being viable to developers. The SA also acknowledges that there will be lead in times for the delivery of new service provisions and that where large scale development is less well related to existing settlements there may be a need for some residents to travel longer distances to essential services in the early stages of development. The SA also recognises the potential need for some level of development at smaller settlements to limit the potential for rural service stagnation. However, an approach which would result in a wider dispersal of development (e.g. Option D) is likely to result in a higher proportion of new residents being located further from essential services and jobs.</p>

Consultee	Summary of comment made	SA Team Response
<p>SA focussed consultation rep 74</p> <p>(redacted individual comment)</p>	<p>A comparison of all site's sustainability assessment should be made prior to any decision on site selection.</p>	<p>This SA Report includes an appraisal of all sites considered as reasonable alternatives for the Local Plan. Separate to this the Council has been undertaking its SALA assessment work which has also been used to inform its selection of site allocations.</p>
<p>SA focussed consultation rep 75</p> <p>(redacted individual comment)</p>	<p>Limited public transport availability means Option A and Option C would increase car usage and demand on the road. It would not deliver all the services required and people would still need to travel out of the development, but public transport would not be able to provide a suitable alternative.</p> <p>The sites identified in options A and C are greenfield sites providing acres of agricultural land. The priority should be for development of derelict and vacant sites.</p> <p>These sites are in the bottom of the valley and store rain water. Development of this land is sure to increase the likelihood and intensity of flooding in neighbouring areas.</p>	<p>The SA Report highlights that the scale of growth which could be achieved through Options A and C could support increased levels of new services and facilities were more development is focussed at larger strategic sites and through a new growth point although either the A38, A419 and A4135. The SA Report has considered the potential for site, policy and growth strategy options to contribute to the development of brownfield land over greenfield as well as flood risk through SA objectives 13: efficient land use and 12: flooding.</p>
<p>SA focussed consultation rep 76</p> <p>(redacted individual comment)</p>	<p>A full assessment of all sites should be publicly available to compare the sites proposed for the local plan prior to submission to the Inspectorate.</p>	<p>This SA Report includes an appraisal of all sites considered as reasonable alternatives for the Local Plan (see Appendix 5). Separate to this the Council has been undertaking its SALA assessment work which has also been used to inform its selection of site allocations.</p>
<p>SA focussed consultation rep 77</p> <p>(redacted individual comment)</p>	<p>The SA should be updated finally, once all of the AGPs have been fully reviewed, to identify relative merits for each AGP. A quick comparison of the sites, knowing the sites in question, highlights significant differences in sustainability which are recognised in the SA Report. Both new AGPs (PGP1 and PGP2) are significantly more sustainable than PS37 due to their location and the proposed developments e.g. developers intend to move the high pressure gas pipeline for both.</p>	<p>This SA Report includes an appraisal of all site options considered to be reasonable alternatives by the Council. This includes the appraisal of all large scale growth points.</p>

Consultee	Summary of comment made	SA Team Response
<p>SA focussed consultation rep 78</p> <p>(redacted individual comment)</p>	<p>It's not sustainable to build anywhere other than option A and C.</p>	<p>This high level conclusion is broadly in line with the conclusions of the SA Report for the Additional Housing Options. The report stated that it is possible to achieve benefits in terms of securing high levels of access to existing services and facilities close to the larger settlements. Options A (intensifying remaining sites), C2 (A419) and C3 (A4135) in particular could help to achieve these benefits in comparison to the original hybrid option (Option 5) for the growth strategy, as well as Options B (dispersal to Tier 2 and 3 settlements) and D (wider dispersal).</p> <p>Focussing much of the additional development to a small number of larger sites could also provide the higher levels of existing residents at these locations with access to a range of new services and facilities.</p>
<p>SA focussed consultation rep 79</p> <p>(redacted individual comment)</p>	<p>A very thorough piece of work; a one page executive summary would have been helpful to summarise the findings, and regular explanations of the colour coding etc of the useful charts would have speeded up assimilation.</p>	<p>A summary of the SA findings for the options for growth is included at paragraph 1.19 of the SA Report for the Additional Housing Options. A summary of the findings for the new small site options and the new growth point options is presented at paragraph 1.41 and paragraph 1.59, respectively of that SA Report. The conclusions (from paragraph 1.76) provide a synopsis of the findings, drawing out the key points from the appraisal work undertaken.</p> <p>As per the SEA Regulations, a Non-Technical Summary has been presented alongside this SA Report for the Regulation 19 Local Plan, to provide a summary of the key points of the SA Report.</p>
<p>SA focussed consultation rep 80</p> <p>(redacted individual comment)</p>	<p>The only sensible answer to this is to focus on areas where there is existing infrastructure - the smaller towns and villages do not have that. To ignore this point is to ignore common sense - increase cost and impact the daily lives of people who already live here.</p>	<p>The SA Report for the Additional Housing Options highlighted the benefits of making use of already identified sites (Option A) and providing development along the A419 (Option C2) and A4135 (Option C3) which would make use of the existing services and facilities at the larger settlements of the plan area. Delivering higher levels of development at smaller towns and villages would result through Options B and D. The SA work highlights the increased adverse impacts of these options in relation to SA objective 5: vibrant communities, 6: services and facilities, 14: climate change and 16: employment when compared to Options A, C2 and C3 and to a lesser extent C3. It is, however, expected that</p>

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		<p>Option A alone is unlikely to deliver the number of homes required over the plan period. Considering this, the SA recommended that the Council continues with a hybrid approach to the growth strategy using elements of Option A along with a large scale growth point along the A38 (Option C1) or A419 (Option C2) might also be pursued.</p>
<p>SA focussed consultation rep 81 (redacted individual comment)</p>	<p>It is my opinion that only Options A and C provide a sustainable approach to development, especially when services and remoteness/isolation are taken into account. I do not believe that Options B or D are sustainable and this is one reason why I cannot support them. New housing resulting from a potential Option B or D would, in some cases, be remote and difficult to access via public transport with little in the way of local public services provided. This is a particular concern for the elderly or very old, and the very young. Even services such as broadband, which is essential to modern life, would be likely to be poor. I worry that such housing would, therefore, not be fit for purpose and would be much better-placed elsewhere.</p>	<p>This high level conclusion is broadly in line with the conclusions of the SA Report for the Additional Housing Options. The report stated that it is possible to achieve benefits in terms of securing high levels of access to existing services and facilities close to the larger settlements. Options A (intensifying remaining sites), C2 (A419) and C3 (A4135) in particular could help to achieve these benefits in comparison to the original hybrid option (Option 5) for the growth strategy, as well as Options B (dispersal to Tier 2 and 3 settlements) and D (wider dispersal).</p> <p>Focussing much of the additional development to a small number of larger sites could also provide the higher levels of existing residents at these locations with access to a range of new services and facilities.</p>
<p>SA focussed consultation rep 82 (redacted individual comment)</p>	<p>Only Options A and C are sustainable. It is important for all new housing to be in a sustainable location. It should have good transport links and be near train stations or motorways. It should be near, or with easy access to, cities which provide jobs, education, medical services and good facilities. Walkways, cycleways and bridleways should be designed into the schemes.</p> <p>Any development in rural areas leads to problems caused by lack of transport options, with poor public transport and heavy reliance on cars which is expensive and bad for the environment. There is also a lack of facilities and services such as broadband.</p>	<p>This high level conclusion is broadly in line with the conclusions of the SA Report for the Additional Housing Options. The report stated that it is possible to achieve benefits in terms of securing high levels of access to existing services and facilities close to the larger settlements. Options A (intensifying remaining sites), C2 (A419) and C3 (A4135) in particular could help to achieve these benefits in comparison to the original hybrid option (Option 5) for the growth strategy, as well as Options B (dispersal to Tier 2 and 3 settlements) and D (wider dispersal).</p> <p>Focussing much of the additional development to a small number of larger sites could also provide the higher levels of existing residents at these locations with access to a range of new services and facilities.</p>

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<p>SA focussed consultation rep 83</p> <p>Cotswolds Conservation Board</p>	<p>Cites the SA Report for the Additional Housing Options paper when explaining the reasons for supporting Options A and C1 and rejecting Options B, C2, C3 and D. However, questions why the SA highlights that Option A would result in some development within the Cotswolds National Landscape</p>	<p>The Council’s reasons for the decision making in relation to the selection of the preferred growth strategy, sites for allocation and policies in the plan have been informed by the findings of the SA. The decision making process is separate from the SA work undertaken, however, and also reflects the findings of other evidence base documents prepared to support the Local Plan review. The reasons for Council’s decision making are included in Appendix 9 of this SA Report.</p> <p>The SA for has appraised the potential effects of all components of the new options for the growth strategy in the Additional Housing Options paper. All options (including Option A) comprise the original hybrid option (i.e. Option 5, the appraisal of which is included in Appendix 4 of the SA Report for the Additional Housing Options paper) plus the variations set out from page 4 to 6 in Council’s focussed consultation document. This includes some development within a number of settlements in the east of the district which lie within or in close proximity to the Cotswolds AONB including Minchinhampton, Nailsworth, Painswick and Brimscombe and Thrupp.</p>
<p>SA focussed consultation rep 84</p> <p>Cam Parish Council</p>	<p>It should be noted that the most sustainable model is one which enhances existing employment and retail sites rather than creating new sites from scratch. New sites are difficult to network to the energy grid and can often lead to more commuting and therefore more pollution and carbon creation.</p> <p>Concreting the countryside is no substitute to good urban planning and expansion using brown field sites wherever possible. Green business models should be encouraged as should addressing the goal of reaching carbon neutral builds by encouraging forward thinking house builders willing to build future proofed energy efficient housing. Developments that offer fast charging points for EVs, sufficient space for parking and communal green spaces could be a stipulation.</p> <p>Cycle networks linked to national routes and super fast broadband should always be considerations reducing the need to commute by car and encourage more home working. Waste disposal, recycling,</p>	<p>Comment noted – no implications for SA.</p>

Consultee	Summary of comment made	SA Team Response
	<p>local access to adequate water supplies and sewerage dispersal are other concerns with more remote sites. Early communications between the local council and local representatives can lead to better quality and more sensitive approaches to builds that add to rather than detract from the local area.</p>	
<p>SA focussed consultation rep 85 BaSRAG (Berkeley and Sharpness Residents' Association)</p>	<p>Your own Sustainability Appraisal shows the new settlement options at Whitminster and Hardwicke/Moreton Valence in the Severn Vale to be at least equally sustainable as those at Sharpness and Wisloe. The table at Appendix 1 compares the sites with a simple substitution of scores for the symbols used in your version. As can be seen, when those scores are totalled all the sites are closely comparable. However, as noted in the SA, such of the comment leading to those conclusions is subjective and we do not necessarily agree with those conclusions. Many of the assertions regarding Sharpness for example, seem to assume that infrastructure, new services and facilities and adequate employment will all come forward in a timely manner to match the housing provision. That is not the experience we see in the delivery of large housing sites, where often the provision of infrastructure for transport, education, health etc lags considerably behind housing provision, if delivered at all, leading to poor sustainability of developments. Given the isolated location of Sharpness, (as noted often in the SA), relative to the newly proposed settlements in the Severn Vale, its sustainability is relatively poor.</p>	<p>It is noted that the consultee has 'added' the sustainability effects to together for the sites they have comments on. The sites in question do perform similarly when considering the effects in this way. However, the effects recorded are not provided to rank sites in this manner. The identification of significant effects can be used to identify constraints and benefits of site and policy options. Certain effects may, however, be given more weight; this may reflect the increased significance of an effect at a given site.</p> <p>The SA Report, in its appraisal of the five initial strategic growth options considered for the Stroud Local Plan, identified that in relation to SA objective 6: services and facilities:</p> <p>"Those new residents at the new growth point to the south of Sharpness would not be provided with immediate access to a high level of existing services and facilities. However, it is expected that the level of development at each growth point to be delivered would support compact, mixed-use development and the delivery of new services and facilities through S106/CIL funding." The justification text implies that residents at these locations would have more limited access to services and facilities in the short term as the consultee has highlighted. The effects recorded for Options 3, 4 and 5 (of strategic growth options initially considered for the Stroud Local Plan Review) which would include large growth points is mixed in relation to this SA objective. The mixed effect reflects the potential for new residents to lack access to services and facilities in the short term.</p>
<p>SA focussed consultation rep 86</p>	<p>Your own Sustainability Appraisal shows the new settlement options at Whitminster and Hardwicke/Moreton Valence in the Severn Vale to be at least equally sustainable as those at Sharpness and Wisloe. The table at Appendix 1 compares the sites with a simple substitution of scores for the symbols used in your version. As can</p>	<p>The SA Report, in its appraisal of the five initial strategic growth options considered for the Stroud Local Plan, identified that in relation to SA objective 6: services and facilities:</p>

Consultee	Summary of comment made	SA Team Response
(redacted individual comment)	<p>be seen, when those scores are totalled all the sites are closely comparable. However, as noted in the SA, much of the comment leading to those conclusions is subjective and we do not necessarily agree with those conclusions. Many of the assertions regarding Sharpness for example, seem to assume that infrastructure, new services and facilities and adequate employment will all come forward in a timely manner to match the housing provision. That is not the experience we see in the delivery of large housing sites, where often the provision of infrastructure for transport, education, health etc lags considerably behind housing provision, if delivered at all, leading to poor sustainability of developments. Given the isolated location of Sharpness, (as noted often in the SA), relative to the newly proposed settlements in the Severn Vale, its sustainability is relatively poor.</p>	<p>“Those new residents at the new growth point to the south of Sharpness would not be provided with immediate access to a high level of existing services and facilities. However, it is expected that the level of development at each growth point to be delivered would support compact, mixed-use development and the delivery of new services and facilities through S106/CIL funding.” The justification text implies that residents at these locations would have more limited access to services and facilities in the short term as the consultee has highlighted. The effects recorded for Options 3, 4 and 5 (of strategic growth options initially considered for the Stroud Local Plan Review) which would include large growth points is mixed in relation to this SA objective. The mixed effect reflects the potential for new residents to lack access to services and facilities in the short term.</p>
<p>SA focussed consultation rep 87 Savills on behalf of L&Q Estates</p>	<p>"The Sustainability Appraisal (Oct 2020) clearly identifies Option A – Intensify, as the most appropriate strategy to deliver additional housing should the need arise. This is supported, and accords with the NPPF, which indicates that development at low density should be avoided, and that developments should make optimal use of potential sites. The consultation document and associated evidence base indicates that 35dph was assumed on average, and a variety of net gross ratios applied. In progressing towards the Regulation 19 consultation, a robust assessment of site capacity should be undertaken to ensure that, in accordance with the NPPF, the delivery of housing on sites is optimised. This should be undertaken now to ensure that both the overall quantum of development from the allocation of sites (including the site specific policies) reflects the housing requirement, and also that the evidence base supporting the allocations is robust and reflective of the final delivery – i.e. the Infrastructure Delivery Plan, viability assessment, transport evidence, HRA etc We make comment in this regard to Site G2 (Whaddon) below.</p> <p>In reviewing the Sustainability Appraisal, we note that Option A results in significant positive effects associated with limiting the loss of greenfield, and limiting the impact on biodiversity, landscape character and the historic environment (#1.22). This is clearly</p>	<p>New options A to D for the strategy for growth have been appraised in their entirety (i.e. considering the development which would occur through the original hybrid approach plus the approach of Options A to D). Therefore, the appraisal of Option A does not consider the approach of intensifying development sites alone but the other components of growth which would make up the overall strategy.</p> <p>The appraisal presented in this SA Report reflects mitigation and benefits which could be achieved through the policies which allocate specific sites.</p>

Consultee	Summary of comment made	SA Team Response
	<p>correct, with the intensification of delivery on already identified sites resulting in a lower environmental impact than adding in new additional greenfield sites into the local plan. As such, it is therefore unclear as to why within Table A (p.9), SA7, 8 and 9 for Option A are scored similarly to other options, which the explanatory text explains would have negative effects on these elements. We assume that this is an error, and that this will be rectified within the SA accompanying the Regulation 19 consultation.</p> <p>We note that the SA (October 2020) confirms it doesn't consider mitigation (#1.8) at this stage in accordance with the same approach taken in the SA (Nov 2019), and this consistency in assessment is supported. In moving to the Regulation 19 stage, we assume as per the Planning Practice Guidance and Schedule 2(7) of the SEA Regulations, the next stage of the SA will consider mitigation and enhancement opportunities associated with the policies within the Local Plan, and as such, provide a comprehensive review of the various spatial and site options.</p>	
<p>SA focussed consultation rep 88</p> <p>Slimbridge Parish Council</p>	<p>Slimbridge Parish Council recognise the need for the Sustainability Appraisal (SA) for these sites and would request that before the final Local Plan goes out to consultation in the Spring, all the major growth points would be assessed alongside each other using the same methodology for each sites, so as a fair comparison can be made in their sustainability aspects.</p> <p>The Parish Council support the A419 as the most sustainable of the 3 travel routes.</p> <p>Growth points should ideally be sited near employment regions which will therefore minimise travel for work purposes. Therefore, growth points situated on the major link roads close to the larger settlements of Stroud / Stonehouse and Gloucester are more self-contained than those further afield such as Wisloe Green (PS37) which has less access to employment and will result in higher commuter journeys.</p> <p>From looking at the 2 new growth points in comparison to Wisloe Green (PS37), the Parish Council wish to raise the following comments:</p>	<p>This SA Report contains the appraisal of all site options considered reasonable alternatives by the Council. All site options have been appraised making use of the SA assumptions in Appendix 4 in this SA Report to ensure a consistent approach.</p> <p>The appraisal work has not considered the potential for noise pollution to be generated from specific nearby sources (such as motorways). Given the more strategic scale of the SA process, this issue is of more relevance for consideration as part of the plan preparation process and if individual planning applications come forward for the site as part of the development process. The appraisal of SA objective 8 has reflected the findings of the landscape sensitivity work for the District and where sites are not covered by that piece of work, the landscape findings of the Gloucestershire Growth Options Report. Similarly, the appraisal of SA objective 9 reflects the findings of the heritage assessment undertaken by the Council as part of the SALA process. The appraisal of SA objective 10 has been informed by the SALA Transport Accessibility Assessment prepared by Gloucestershire County Council; this reflects the potential for increased levels of</p>

Consultee	Summary of comment made	SA Team Response
	<ul style="list-style-type: none"> • SA5 Noise pollution – the topography of Wisloe Green (PS37) demonstrates varying height levels in relation to the M5, the railway line and the A4135 flyover and will have a significant impact on noise levels for this growth point compared to the Whitminster (PGP1) and Hardwicke (PGP2) growth points that have more natural sound barrier with the way the land lies in those areas. • SA8 Conserving character and distinctiveness – the development of a growth point at Wisloe Green (PS37) is not a stand alone development as it would result in coalescence of parishes, joining Slimbridge Parish with Cam Parish, and therefore becoming one urban extension resulting in a loss of its rural identity and character. • SA9 Conserving historic environment – a number of archaeological digs have occurred within Slimbridge recently by the local history society, identifying many archaeological items. Wisloe Green (PS37) is likely to be no different, and with the recent discovery of the Roman Villa in Cam, just a short distance away, the site would require significant consideration to its historical value in the community, with a suspected presence of further Roman buildings on site. • SA10 Air quality – with Wisloe (PS37) based in the rural south of the district and therefore likely more commuter travel will be required than at Hardwicke (PGP2) or Whitminster (PGP1), it is likely to produce the worst air quality outcome with higher pollution from car usage as being further away from employment sites. • SA11 Water quality – the Sustainability Assessment fails to state that Wisloe Green (PS37) falls entirely within a Drinking Water Safeguarding Zone, as opposed to being near one. • SA12 Flood risk – it is disappointing to see that this document says about Wisloe (PS37) being mostly free of higher flood risk as there seem to be no background research done on the past years of Slimbridge Parish Council and local parishioners (with very local knowledge) working with Gloucestershire County Council and Severn Trent Water on the parish wide flooding issues and the lack of capacity of the sewage works for the area. Whilst much work and 	<p>travel from individual sites in the plan area. The appraisal of site PS37 (originally included in the SA Report for the Draft Local Plan and represented here) highlighted that the site falls within a Drinking Water Safeguarding Zone and recorded a significant negative effect in relation to SA objective 11. The appraisal of sites in relation to SA objective 12 considers whether sites include areas of flood zone 3a or 3b. The availability of this information for all sites allows for a consistent approach to their appraisal with regards potential flood risk. The site contains mostly land that is of Grade 3b Agricultural Land Classification and this is reflected in the effect recorded for SA objective 13 for the site. The appraisal of sites which would provide new employment land in relation to SA objective 16 reflects the amount of employment land they could provide.</p>

Consultee	Summary of comment made	SA Team Response
	<p>monies have been put into rectifying these issues, the area is still under review by STW with regards to the effects of sewage capacity and dealing with surface water flooding. Therefore, it is believed that significant more in depth studies are required on this and these should include professional site surveys.</p> <ul style="list-style-type: none"> • SA13 Protection of soil quality – It is believed that Wisloe Green (PS37) is of Grade 2 quality soil and should therefore be protected, as this is of high quality with little of this soil elsewhere in the district. Evidence of this has been mentioned in the above paragraphs under Q9. • SA16 Employment – whilst some employment will be included at Wisloe Green (PS37) it is still likely that this site will result in higher commuting to access jobs at the main employment centres which are more accessible by having growth points at Whitminster (PGP1) and Hardwicke (PGP2). <p>Slimbridge Parish Council overall concludes that a hybrid approach is likely to be the best sustainable option that will achieve the required housing numbers for SDC. The Parish Council believes that large scale growth points are more sustainable on the travel routes of C1 (A38) and / or C2 (A419) rather than at C3 (A4135).</p> <p>The Parish Council believes that the 2 new growth points at Whitminster (PGP1) and Hardwicke (PGP2) are more sustainable than the growth point at Wisloe Green (PS37) with the main reasons being:</p> <ul style="list-style-type: none"> • Commuting miles for employment • High quality soil • Coalescence • Archaeological and historical sensitivity • Noise and air quality • Flood risk and water quality. 	

Consultee	Summary of comment made	SA Team Response
<p>SA focussed consultation rep 89</p> <p>Dursley Town Council</p>	<p>The Sustainability Appraisal is very thorough and focuses on the environmental, economic and social impacts.</p> <p>Within the report summary and conclusions, it is 'recommended that the Council continues with a hybrid approach to the spatial strategy. Using elements of Option A would achieve benefits associated with higher densities of development and more efficient land use'. We do not agree with using elements of Option A within a hybrid strategy for the reasons outlined in our response to question 1:</p> <p>"To adopt 'Intensify' as a strategy option would only result in overcrowded developments, further loss of green space and amenity (at a time when the importance of having green space to grow and play has come into sharp focus during the pandemic), excessive pressure on infrastructure and loss of identity and local character. Overall, it has a degenerative, negative impact on an area."</p>	<p>Option A has been outlined in the Council's Additional Housing Options paper as taking forward an approach to increase densities in some locations whilst delivering well designed places reflecting the existing local character. The SA Report for the Additional Housing Options states that this approach could result in a high proportion of new residents having a good level of access to existing health care facilities and other facilities such as sports facilities and open spaces which could help to improve public health. However, that the effects of delivering the required level of development through increases to the remaining sites in the plan area will be influenced by the location of sites at which intensification would occur and the capacity of services and facilities at these areas. For this reason, the overall mixed significant positive and minor negative effect recorded for this option in relation to SA objective 2: health and wellbeing is uncertain.</p>
<p>SA focussed consultation rep 90</p> <p>Grass Root Planning on behalf of Redrow Homes (SW) Ltd</p>	<p>We do not have any comments regarding the additional Sustainability Appraisal work which accompanies the consultation document; however, we have some concerns over the original documents in support of the Local Plan which seems to underestimate the lack of credible transport options available at Sharpness.</p>	<p>The appraisal of the sites allocated at Newtown and Sharpness (PS34, PS35 and PS36) in the Pre-submission Draft Plan have been appraised in this SA Report (Appendix 7). The appraisal of these sites (consistent with the appraisal of all other site options) reflected the findings of the SALA accessibility assessment for SA objective 10: air quality (i.e. a 'policy-off' appraisal). This work was then updated to reflect the policy requirements for each site. For sites PS34 and PS36 a significant negative effect has been recorded through the 'policy-off' appraisal in relation to this objective.</p>
<p>SA focussed consultation rep 91</p> <p>Wisloe Action Group</p>	<p>All the proposed additional growth points, which have been consulted upon individually, will need to be finally compared to determine their relative sustainability attributes before being sent out for final consultation in the 2021 Local Plan.</p> <p>WAG supports larger scale AGP development at C1 (A38) in the North of the District and/or C2 (A419) as the evidence demonstrates these are more sustainable than an AGP at C3 (A4135).</p>	<p>This SA Report presents the SA findings for all site options considered as reasonable alternatives by the Council. The Council's reasons for the decision making in relation to sites included for allocation and the growth strategy in the plan have been informed by the findings of the SA. The decision making process is separate from the SA work undertaken, however, and also reflects the findings of other evidence base documents prepared to support the</p>

Consultee	Summary of comment made	SA Team Response
	<p>A number of detailed points are highlighted in the WAG response to promote growth points PGP1 and PGP2 (included originally in the SA Report for the Additional Housing Options paper) over site PS37 (included originally in the SA Report for the Draft Local Plan):</p> <p>In relation to SA objective 2: health and wellbeing it is stated that PS37 is further from the main centres of employment, distance to M5 junctions and a higher dependency on commuting journey miles.</p> <p>In relation to SA objective 5: vibrant communities it is stated that the site is potentially at risk of noise issues from the M5 and railway line.</p> <p>In relation to SA objective 8: landscapes/townscapes it is stated that the site would lead to coalescence within the Parish and with Cam and Dursley.</p> <p>In relation to SA objective 9: historic environment it is stated that the site contains at least one and possibly more Roman buildings and that the Gloucestershire County Council Heritage Team are aware of the sensitivity of the site.</p> <p>In relation to SA objective 10: air quality it is stated that the proximity of the site to major transport links coupled with the highest commuter mileage option (compared to other growth point options) is likely to result in undesirable air quality.</p> <p>In relation to SA objective 11: water quality it is stated that the site falls entirely within a Drinking Water Safeguarding Zone.</p> <p>In relation to SA objective 12: flooding it is stated that the topography of the site makes it susceptible to surface water and sewerage flooding.</p> <p>In relation to SA objective 13: efficient land use it is stated that the site contains Grade 2 agricultural land and a high-pressure gas pipeline.</p> <p>The WAG response also highlights that PS37 site will require sterilisation of mineral resources prior to development.</p>	<p>Local Plan review. The reasons for Council's decision making are included in Appendix 9 of this SA Report.</p> <p>The appraisal of all site options (including growth points) has been undertaken in line with the assumptions set out in Appendix 4 of the SA Report. This has ensured a consistent approach to the appraisal of the large number of sites considered. Some of the points raised by the consultee (most notably in relation to SA objective 2 and 5) would require additional and more detailed information being required to appraise all site options to the same level of detail. The level of appraisal undertaken through the SA to date is appropriate for its high level and strategic nature. Many of the related points highlighted by the consultee (i.e. the potential for noise pollution at the site) are of more relevance for consideration as part of the plan preparation process and if individual planning applications come forward for the site as part of the development process.</p> <p>The appraisal of SA objective 8 has been informed by the landscape sensitivity work prepared by the Council. Where sites are not covered by this work, the appraisal is informed by the landscape findings of the Gloucestershire Growth Options Report.</p> <p>The appraisal of SA objective 9 has been informed by heritage assessment work undertaken by the Council.</p> <p>The appraisal of SA objective 10 has been informed by the SALA Transport Accessibility Assessment work prepared by Gloucestershire County Council which considered accessibility to town/district/local centres, employment sites and services and facilities that people may be required to access on a regular basis.</p> <p>The appraisal of SA objective 11 considered if sites lie within a Drinking Water Safeguarding Zone. This was highlighted through the site appraisal for site PS37 for which a significant negative effect was recorded in relation to SA objective 11.</p> <p>The appraisal of SA objective 12 considered whether the site lies within flood zones 3a or 3b and on greenfield or brownfield land. As the site lies outside of higher risk flood zones but contains greenfield land and would therefore increase the area of</p>

Consultee	Summary of comment made	SA Team Response
		<p>impermeable surfaces in the plan area a minor negative effect was recorded. The topography of the site is considered to be outside of the scope of the SA.</p> <p>The appraisal of SA objective 13 highlighted that the site contains greenfield land of area of Grade 3b agricultural quality.</p> <p>It is recognised that the development of the site may result in the sterilisation of mineral resources and that the location of a high-pressure gas pipeline within the site boundary may affect its viability and deliverability. The potential for the sterilisation of mineral resources at the site has not been considered for all site options. The viability and deliverability of the site is a detailed consideration for the plan making process and is not a consideration for the SA.</p>
<p>SA focussed consultation rep 92</p> <p>Natural England</p>	<p>We agree with the uncertainties identified in The Sustainability Appraisal (SA).</p>	<p>Comment noted – no implications for SA.</p>
<p>Upton St Leonards P.C.</p>	<p>The Parish Council draws attention to the proximity of the M5 to the sites at Whitminster (PGP1) and at Hardwick and Moreton Valance (PGP2). Effectively this may mean that a part of these sites, close to the Motorway, will need to be deleted if motorway generated pollution is to be avoided. This recommendation comes from a community struggling with these problems in an area where the M5 runs close to existing housing. The Parish Council notes that surprisingly, the Consultant’s Sustainability Report makes no reference to these issues when evaluating the sites potential. A considerable oversight.</p>	<p>To ensure that all site options are appraised consistently to the same level of detail the SA has made use of the assumptions in Appendix 4 in the full SA Report. This has not considered the potential for pollution to be generated from specific nearby sources (such as motorways). Given the more strategic scale of the SA process, this issue is of more relevance for consideration as part of the plan preparation process and if individual planning applications come forward for the site as part of the development process.</p>
<p>McLoughlin Planning on behalf of Avant Homes</p>	<p>In making additional allocations, this consultation sets out 4 fixed options (intensification, towns and villages, additional growth point and wider dispersal). In general terms, Avant consider that there is a need for a combination of options. However, conspicuous by its absence is any reference in the Document (or accompanying</p>	<p>The SA work for the Local Plan review initially considered four options for the growth strategy which the additional options (A, B, C1, C2, C3 and D) built upon. As stated in paragraphs 1.9 to 1.10 in the SA Report for the Additional Housing Options paper, the</p>

Consultee	Summary of comment made	SA Team Response
	<p>Sustainability Appraisal) regarding the option for additional allocations at Tier 1 locations (the main towns, including Dursley).</p> <p>As a result, the presentation of spatial options in the document is flawed in that it fails to meet the requirements of paragraphs 31, 32 and 35 of the Framework. These paragraphs when read together set out a requirement for relevant evidence, plans to be tested against a Sustainability appraisal and demonstrate that they are an appropriate strategy, taking into account reasonable alternatives. In this instance, the consultation fails on all three requirements in that the need to accommodate additional development and the opportunities for additional development at Tier 1 locations is conspicuously ignored.</p>	<p>Council's paper 'Local Plan Review: Developing a preferred strategy (revised March 2018)' provides further detail on each initial option.</p> <p>Option 1 is to 'continue to concentrate housing and employment development at a few large sites located adjacent to the main towns in the district' and includes the following components:</p> <ul style="list-style-type: none"> • Sites (capacity of 10 houses +) within settlement development limits (SDL) at Tier 1 settlements (Stroud, Stonehouse, Cam and Dursley) • Medium to large sites (c.150-1500) adjoining SDLs at Tier 1 settlements + Gloucester, often with potential to accommodate mixed uses or supporting infrastructure • A small sites windfall component at Tiers 1-3 settlements only <p>This option (which would include development sites at Dursley as a Tier 1 settlement) is considered to adequately cover the approach to the growth strategy put forward by the consultee and has been subject to full SA. The initial growth strategy options were considered from the outset of the plan making process, before a preferred strategy was decided upon, and have been subject to full SA as part of the emerging plan as required. There is no requirement for the strategy options to be re-consulted upon as part of every Regulation 18 consultation stage.</p>
Cllr Haydn Jones	<p>The Sustainability Appraisal indicates that Whitminster (PGP1) and Hardwicke (PGP2), when compared with PS37, contain more very positive scorings. There does appear however to be an anomaly with air quality SA10. PS37 appears to have a marginally better rating than both Whitminster (PGP1) and Hardwicke (PGP2). Put simply, this cannot be possible. Could you please review the results for the air quality assessment and confirm the correct detail? The sustainability appraisal needs to properly recognise the CN2030 commitment. Potential new strategic sites, in particular, present the opportunity to reshape and rebalance the current draft local plan proposals across the district and create genuinely sustainable communities along the A419 engine room of the Stroud District.</p>	<p>This SA Report has revisited the effects recorded in relation to SA objective 10: air quality for the sites considered as part of the SA Report for the Additional Housing Options consultation. This reflects the updates to the SALA Transport Accessibility Assessment work prepared by Gloucestershire County Council. Through the SA Report for the Additional Housing Options where sites were not included in the accessibility assessment work, they were appraised based on their proximity to sites which were included in that work. The SA work addresses climate change (and District's commitment to be carbon neutral by 2030) through SA objective 14: climate change. All site, policy and growth strategy options have been tested against this SA objective.</p>

Consultee	Summary of comment made	SA Team Response
<p>Pegasus Group on behalf of Robert Hitchins Ltd (in relation to Grove End Lane, Whitminster and Land West and East of School Lane)</p>	<p>It is noted in the SA that this site ((BER016) Hook Street Farm, Lynch Road, Berkeley) is recorded as containing areas of land within flood zones 3a or 3b and therefore a significant negative effect in relation to SA objective 12: flooding (red double negative).</p> <p>There is no Flood Risk Assessment of this site or for BER017 as the Council's evidence base relates to the SFRA (Draft 2019) which only covers site PS33 in the Draft Plan and identifies the flood risk.</p> <p>The Environment Agency mapping for flood risk shows the area as Flood Zone 3, with an area shown as flood defences running in a north /south direction to the west of Berkeley, running through the site. Therefore, an objection is made to the site.</p> <p>The site ((BER017) Bevans Hill Farm, Lynch Road, Berkeley) is on greenfield land. An area of the site to the east lies within Flood Zone 3a or 3b but does not comprise more than 50% of the site's total area. However, in the absence of a SFRA, the Environment Agency provides information on the site – to the extent that the entire site would appear to be within Flood Zone 3 and the area benefits from flood defences. The SA only records this as a single negative. It is considered that this site is not suitable for development.</p> <p>The LUC (2019) Sustainability Appraisal that accompanied the Draft Local Plan consultation indicated at in Appendix 5 page 125 Table A5.1 that the site (WHI001 submitted through the SALA May 2017 and appraised in previous iterations of the SA Report) performs well compared to other submitted sites at Whitminster. The site has no discernible impact on the historic environment or water quality, climate change or waste while it is judged as having a minor positive impact on housing, health and economic growth. However, it concludes in Appendix 7 page 694 that:</p> <p>"Emerging Strategy Paper Stage: The SALA identified that the site may have future potential for some development subject to resolving specific constraints and impacts. However, the scale of development proposed and location of this site would not accord with the emerging strategy of allocating development at the main tier 1 towns and at two new settlements, together with modest</p>	<p>The appraisal of all site options has been undertaken in line with the assumptions set out in Appendix 4 of the SA Report. This has ensured a consistent approach to the appraisal of the large number of sites considered. For SA objective 12: flooding the assumption states the following:</p> <ul style="list-style-type: none"> • Sites that are entirely or mainly (i.e. >50%) on greenfield land that is within flood zones 3a or 3b or mainly on brownfield within flood zones 3a or 3b are likely to have a significant negative (--) effect. • Sites that are either entirely or mainly on greenfield outside of flood zones 3a and 3b, are likely to have a minor negative (-) effect. <p>The SA work for the Additional Housing Options consultation highlighted that site BER016 falls mostly within flood zone 3a or 3b and therefore a significant negative effect was recorded in relation to SA objective 12: flooding.</p> <p>As less than 50% of site BER017 is within an area of higher flood risk and is greenfield land a minor negative effect is recorded in relation to SA objective 12: flooding.</p> <p>It is also correct to highlight that SA work recommended that a hybrid approach to the growth strategy was continued.</p> <p>Comment noted – no implications for SA.</p> <p>This SA Report includes the appraisal of all site options considered by the Council as reasonable alternatives for allocation. This includes site options (inclusive of site WHI001 and WHI014 which the consultee has compared) included in all previous iterations of the SA.</p> <p>The consultee's comments in relation to and comparison of the SA findings for sites WHI014/PGP1 and HAR006-HAR009 and HAR015-HAR016/PGP2 are also noted. The effects recorded through the SA are not always comparable. The identification of significant effects can be used to identify constraints and benefits of site and policy</p>

Consultee	Summary of comment made	SA Team Response
	<p>allocations at tier 2 settlements and lesser allocations at tier 3a settlements nearest to Stroud and Wotton-under-Edge. Draft Local Plan Stage: Having considered the scale of growth appropriate for this settlement set out in the Draft Plan and the benefits and disbenefits of this site in comparison with alternative sites at this settlement, it is not proposed at this stage to allocate this site for development.”</p> <p>The reasons for the Council’s decision making are noted i.e. at this stage (in 2019) it was not proposed to allocate this site for development, however, circumstances have now changed and the Council is now considering potential sites to meet a possibly higher housing requirement as a result of changes to the standard method (the revised standard method proposes increasing the requirement for Stroud district from the level set out in the Draft Plan in 2019 of 638 homes per annum to 786 homes per annum).</p> <p>In which case land east of School Lane, should be reconsidered particularly given the positive assessment above.</p> <p>Land south of Hyde Lane was not assessed in 2019 SA as it had not been submitted to the Council. The site appears in the 2020 SALA referenced WHI012 and has been assessed in the Sustainability Appraisal 2020.</p> <p>However, in the latest SA there is no comparison assessment of the all the potential sites for Whitminster i.e. no replica table of Table A5.1 in the 2019 appraisal as it only focuses on new potential sites.</p> <p>In order to compare both sites i.e. land south of Hyde Lane (WHI012) and land east of School Lane Sustainability Appraisal (WHI001) it is necessary to refer to the 2020 Sustainability Appraisal (SA) and the 2019 Sustainability Appraisal (SA) respectively and it can be seen land south of Hyde Lane does not score as well in the assessment, it receives three double negatives and a question over the effect on the historic environment.</p> <p>It is considered that land east of School Lane is more sustainable, being within walking distance of the school, where safe routes can be achieved, the site is generally more accessible as it is not</p>	<p>options. Certain effects may, however, be given more weight; this may reflect the increased significance of an effect at a given site.</p> <p>The Council’s reasons for the decision making in relation to sites included for allocation in the plan have been informed by the findings of the SA. The decision making process is separate from the SA work undertaken, however, and also reflects the findings of other evidence base documents prepared to support the Local Plan review. The reasons for Council’s decision making are included in Appendix 9 of this SA Report.</p>

Consultee	Summary of comment made	SA Team Response
	<p>accessed from a single track lane and the site was screened out of the SALA Heritage assessment as having no heritage impacts.</p> <p>Consequently, land east of School Lane has a more positive SA assessment and should be included in the Plan.</p> <p>Paragraph 1.25 of the Sustainability Appraisal (2020) states that : “A new growth point would support new service and infrastructure provision which could help to reduce the need to travel by private vehicle in the plan area as well as potentially supporting infrastructure which could support the use of energy from more sustainable sources. Importantly, it would also ensure that housing need in the plan area is met by delivering a high level of development at a single location. This approach could also support a large amount of affordable housing delivery in Stroud District.”</p> <p>The site (WHI014/PGP1 which the consultee supports) provides the opportunity to deliver a comprehensive mixed use development which links and complements the existing settlement pattern and provides for housing, employment, social and recreational needs with access to extensive green infrastructure.</p> <p>The location of this land at the confluence of the A38/M5 and A419 corridors, and relative proximity to Stroud/Stonehouse, Cam/Dursley and Gloucester presents an opportunity to achieve a mixed use development in a sustainable highly accessible (including by public transport) location.</p> <p>The SA recognises the benefits of this location e.g. the existing strategic</p> <p>Furthermore, it is noted that the Sustainability Appraisal records that a portion of the central area of the Moreton Valence/Hardwicke growth point option lies within higher risk flood areas. Whilst each option contains substantial portions of Grade 3 agricultural land, the land by Moreton Valence/Hardwicke (PGP2) also contains a small area of higher value Grade 2 agricultural land.</p> <p>It is also noted that in the 2019 SALA Assessment Site HAR015 Land at Moreton Valence was rejected and is listed in Appendix 4</p>	

Consultee	Summary of comment made	SA Team Response
	<p>“The site is not suitable for housing development as this would materially and adversely alter the rural character. There is a likely high landscape impact from housing development (in a relatively remote location) adversely affecting the open rural character of the flat Severn Vale landscape and visible from the escarpment edge of the AONB. The city edge would be perceived to have moved southwards significantly as a finger into the flat open countryside. Overall, this site has significant heritage constraints. The site’s sensitivity relates to the sense of Grade II* Hardwicke Court’s place in the landscape, the character and identity of Hardwicke as a distinct historic settlement and the perception of a social and economic hinterland comprised of a network of farmsteads and clustered cottages - including the two Grade II listed farmhouses within the site boundary, and Grade II Hiltmead Farm, just outside the site. Their character and historic significance is drawn from the rural context and landscape setting. Any development would have to address potential flood risks. There are therefore potential impacts preventing sustainable development in this location.”</p> <p>Having read the SA and the assessment of the sites and the options, it recommends that the Council continue with a hybrid approach to the spatial strategy. Pegasus on behalf of RHL support this approach and consider that this best accords with the NPPF.</p>	

Appendix 2

Baseline Information

- A2.1 Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues and means of dealing with them.
- A2.2 Annex 1 of the SEA Directive requires information to be provided on:
- (a) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;*
 - (b) the environmental characteristics of areas likely to be significantly affected;*
 - (c) any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [the 'Birds Directive'] and 92/43/EEC [the 'Habitats Directive'].*
- A2.3 Baseline information was previously collated for the June 2009 Local Development Framework SA Scoping Report and this has been used as the starting point to collate baseline data. This information has been revised and updated to make use of the most recent available information sources, and these sources have been referred to in footnotes. The revised and updated baseline data set out in this section reflects the scope of the Local Plan Review.
- A2.4 Data referred to have been chosen primarily for regularity and consistency of collection, in order to enable trends in the baseline situation to be established, and also subsequent monitoring of potential sustainability effects.

Geography

- A2.5 Stroud District is located in the western part of Gloucestershire and covers an area of approximately 45,325ha. The District is bordered by Forest of Dean District on the other side of the River Severn to the west, Gloucester and Tewkesbury to the north, Cotswold District to the east and South Gloucestershire to the south.
- A2.6 Stroud is made up of 30 wards and 52 parishes. The ten electoral divisions in Stroud District are Bisley and Painswick; Cam Valley; Dursley; Hardwicke and Severn; Minchinhampton; Nailsworth; Rodborough; Stonehouse; Stroud Central; and Wotton-under-Edge. The adopted Stroud District Local Plan has set out eight parish cluster areas which have distinct qualities, issues, constraints and opportunities. These cluster areas are the Gloucester Fringe, Severn Vale, Stonehouse Cluster, Berkeley Cluster, Cotswold Cluster, Wotton Cluster, Stroud Valleys and Cam and Dursley⁶.
- A2.7 The town of Stroud is located approximately 30km to the north east of Bristol. It is located within the centre-north of the District. The Stroud Valleys is the focus of much of the development in Stroud (approximately 40%) as well as a significant portion of its population given that it includes both Stroud and Nailsworth. Other important centres in the District include Cam and Dursley and Stonehouse (all first tier settlements). The Settlement Hierarchy set out in the adopted Local Plan 2015 identifies Berkeley, Frampton on Severn, Hunts Grove, Minchinhampton, Nailsworth and Wotton-under-Edge as second tier Local Service Centres with further smaller settlements spread across the District which offer a more limited level of access to services and facilities.
- A2.8 In addition to connections with the surrounding towns and areas of Gloucestershire, Stroud District has further close links with the West Midlands and South Wales. The M5 runs through the District from north to south, providing links with Birmingham to the north and South Wales (via the M48).
- A2.9 The District's landmass sits on the estuary of the River Severn to the west. The River Frome empties into the estuary after passing through the settlements of Brimscombe, Stroud and Stonehouse from east to west respectively within the District. The District also benefits from the presence of a number of canals which are currently subject to various stages of restoration. The Stroudwater Canal and the Thames and Severn Canal run from east to west through the District and in the past connected the River Severn to the River Thames at Lechlade. Together these

⁶ Stroud District Council (November 2015) *Stroud District Local Plan*

canals form the Cotswold Canals. The Gloucester and Sharpness Canal runs along much of the course of the River Severn at the western edge of the District from south to north towards Gloucester.

- A2.10 The Stroudwater Navigation Connected project which is being undertaken by the Stroud District Council and Cotswold Canals Trust has received initial support from the Heritage Lottery Fund (HLF) to connect Stroud and Stonehouse to the nation's inland waterway network by 2024. HLF has committed £872,000 towards the scheme and a further £9 million has set aside should the additional funding criteria be met.
- A2.11 In May 2019, The Cotswold Canals Trust was awarded a £4 million grant from Highways England for the restoration of the Missing Mile, a stretch of canal west of Eastington which was filled in during construction of M5 and associated works. Work continues with volunteer restoration of other sections of the canals until further funds are raised.

Population

- A2.12 The total resident population in Stroud as per the Office for National Statistics Mid-2019 Population Estimates⁷ is recorded as 119,964 which makes the District the second most populous in Gloucestershire. At present there are slightly more females (60,991) in the District than males (58,973). The population density for the District is 260 people per square kilometre as of 2019, which is slightly higher than the figure for Gloucestershire (240 people per square kilometre) and the wider South West region (236 people per square kilometre).
- A2.13 The District saw a population change of 0.75% from mid-2017 to mid-2018 with a net internal migration rate of 0.78% and net international migration rate of 0.13%⁸. The South West region as a whole is expected to see an increase of 383,000 residents up to 2028 which represents a 6.8% increase from 2018 figures. This is slightly higher than the national figure for England of 5.0%⁹.
- A2.14 The District has a marginally lower proportion of people who are of working age (59.9%) when compared to the South West region (60.6%) and Great Britain as a whole (62.9%). The proportion of work age residents who are economically active (88.8%) is slightly higher than the figure for the wider South West region (81.3%) and the national (78.5%) figure¹⁰. It is predicted that by 2026 those over 65 will represent 25.1% of the District's population. The population growth in the South West region for those of working age is expected to be less than 2.6% reflecting a trend towards an increasingly ageing population¹¹.

Housing

- A2.15 The latest census data in 2011 showed that there were 47,794 households in Stroud District¹². This represented an increase in household numbers of 7.1% or 3,177 households since 2001¹³. This increase was mainly attributed to a rise in the number of one person households and cohabiting couples. It is expected that this trend is likely to continue in the District.
- A2.16 Household projections show that in 2018 there are approximately 50,564 households in the District. Over the following ten year period up to 2028 projections show that the number of

⁷ ONS (April 2020) Population estimates for the UK, England and Wales, Scotland and Northern Ireland

⁸ ONS (June 2019) *Population estimates for the UK, England and Wales, Scotland and Northern Ireland: mid-2018*

⁹ ONS (May 2018) *Subnational population projections for England: 2018-based*

¹⁰ Nomis (Accessed July 2019) *Labour Market Profile – Stroud* Online at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157376/report.aspx>

¹¹ ONS (May 2018) *Subnational population projections for England: 2016-based*

¹² ONS (March 2011) *Census data*

¹³ Gloucestershire County Council (March 2016) *Understanding Stroud 2015*

households is set to increase to approximately 55,241¹⁴. Percentage increase of households from 2018 to 2043 is projected to be 21%; increase from 50,564 to 61,230¹⁵.

- A2.17 Stroud saw an increase of 8.6% in terms of the number of dwellings in the District between the 2001 and 2011 censuses. The growth at national level (8.3%), regional level (9.9%) and county level (9.0%) were comparative to that experienced in Stroud during the same period. The latest available information shows that as of March 2019 there were 53,642 dwellings in the District of which 46,834 were in private ownership. **Table A2.1** below displays the comparative number of dwellings within the District and at County level between 2012 and 2019¹⁶.

Table A2.1: Number of dwellings by year in Stroud District and Gloucestershire County

Year	Stroud District	Gloucestershire County
2012	50,340	271,090
2013	50,750	273,410
2014	51,220	276,110
2015	51,800	278,940
2016	52,230	281,760
2017	52,581	284,583
2018	53,078	288,160
2019	53,642	292,034

- A2.18 The 2011 census highlighted that there were 14,952 homes with no usual resident household in Gloucestershire in 2011, representing 5.5% of all of the accommodation available for residence in the County which is lower than the average for the South West (6.0%) but higher than the figure for England (4.3%)¹⁷. This is inclusive of derelict properties and those not in use as well as holiday homes.
- A2.19 In terms of housing deprivation measured as part of the 2019 Indices of Multiple Deprivation show that only one area (by Wotton-under-Edge) is within the most 10% deprived nationally for Barriers to Housing and Services, which is a decrease from the figure for 2015.¹⁸
- A2.20 The existing housing stock in the District is relatively old and the worst housing conditions are most evident in the private rented sector. Of all homes in Stroud 25.5% were built pre-1919. This is slightly above the national average. A smaller proportion of housing stock in Stroud has been built between 1919 and 1964 and a significantly higher proportion of homes than the national average were built post 1980. The average percentage of properties built post-1980 nationally is only 18.5% while in Stroud the figure is 28.6%¹⁹.
- A2.21 The minimum housing requirement for the period April 2006 to March 2031 as set out in the adopted Local Plan is 11,400 homes. The Stroud District Land Availability²⁰ reports that there has been a total of 6,346 dwelling completions between 1st April 2006 and 31st March 2020, and at 1st April 2020, a further 7,034 new dwellings are committed. As such, completions and commitments total 13,380 dwellings, 1,980 above the adopted Local Plan's minimum requirement of 11,400. Of the dwellings completed between 1st April 2006 and 31st March 2018, 63% were on brownfield sites while 37% were on greenfield sites. Commitments at 1st April 2019 are split between 32% on brownfield sites and 68% on greenfield sites, reflecting the large housing allocations identified in the Local Plan.
- A2.22 The Council's Strategic Assessment of Land Availability (SALA)²¹ details sites with potential for housing as well as for employment, retail and community uses. The SALA identifies sufficient housing completions, commitments, allocations, SALA sites within settlements and small site windfalls to deliver the Local Plan requirement by 2031 with a surplus of 1,980 additional homes

¹⁴ ONS (July 2016) *Household projections for England and local authority districts*

¹⁵ ONS (June 2020) *Household projections for England: 2018-based*

¹⁶ Ministry of Housing, Communities & Local Government (March 2018) *Number of dwellings by tenure and district, England*

¹⁷ Local Authorities of Gloucestershire (March 2014) *Strategic Housing Market Assessment Update*

¹⁸ DCLG (2019) *Indices of Deprivation: 2019 and 2015* Available at: http://dclgapps.communities.gov.uk/imd/ioid_index.html

¹⁹ Stroud District Council (March 2015) *Housing Strategy 2015 – 2019 (New Housing strategy 2019-2024 is under consultation)*

²⁰ Stroud District Council (October 2020) *Stroud District Housing Land Availability Residential Commitment in Stroud District as at 1st April 2020*

²¹ Stroud District Council (May 2017) *Strategic Assessment of Land Availability*

above the minimum requirement. An annual housing requirement of 456 dwellings has been used for calculating the latest five-year housing land supply figure for the District. The deliverable housing supply position for the 2020-25 period sits at 6.56 years²².

- A2.23 The adopted Local Plan has also identified a target of 950 additional bedspaces in Class C2 care homes, to meet the needs of older people. The Gloucestershire Local Housing Needs Assessment²³ identifies an updated need for 67% of all housing to meet M4(2) Category 2 requirements and 8% of all housing to meet M4(3) Category 3 requirements to meet the needs of those with accessibility issues and wheelchair users. The evidence also supports the need for a target of at least 25% or more of specialist housing for older people.
- A2.24 Gloucestershire's Gypsy and Traveller Accommodation Assessment (GTAA) reported that in Stroud up to 2031 there is no current or future need associated with a household that meets the new planning definition. However, there is a requirement for up to seven additional pitches for unknown Gypsy or Traveller households during the period 2021-2031. The requirement for Travelling Showpeople plots for households that meet the planning definition is eight additional plots and for up to four plots for unknown households for the period 2016-2031²⁴.

Social Inclusion and Deprivation

- A2.25 Using the Index of Multiple Deprivation (IMD) rank of average summary measure, Stroud District ranked 279 out of 317 local authorities in 2019²⁵. This follows the trend of the wider county area given that Gloucestershire is not very deprived, with even the most deprived districts (Gloucester City, and Forest of Dean) ranked 143 and 138 for deprivation out of 317 English authorities respectively²⁶.
- A2.26 Stroud itself has no lower super output areas (LSOAs) that rank in the top 20% most deprived in England. There are only three LSOAs in the District (within the Cam West, Dursley and Stonehouse wards) which are within the 30% most deprived LSOAs in England²⁷.

From the 2015 IMD information release to 2019, Stroud's worst ranking domain remains "Barriers to Housing and Services". However, whereas the District had two LSOAs within the 10% most deprived neighbourhoods in the country in relation to this measure in 2015 (within the southern portion of Berkeley Vale and Painswick and Upton ward), only the southern portion of Berkeley Vale was reported as being within the 10% most deprived neighbours in the country in relation to this measure in 2019. Stroud performs favourably relative to the rest of Gloucestershire in this domain, and has the county's least deprived LSOA which takes in the settlement of Berkeley (Stroud012C) which ranks 32,232th out of 32,844 nationally. Stroud District has seen a relative improvement in the national rankings since 2015 for "Crime and Disorder". Improvements with regard this indicator 2019 have been observed within the Stanleys, Hardwicke, Painswick and Upton²⁸.

- A2.27 UK average house prices increased by 7.5% over the year to January 2021, with the North West region of England seeing the highest annual growth in average house prices (12.0%) while the West Midlands saw the lowest (4.7%). The South West region of England experienced an annual growth of 6.7% in average house prices over the year to January 2021²⁹. Within Stroud itself

²² Stroud District Council (November 2020) *Housing Land Supply Assessment Update November 2020*

²³ Opinion Research Services on behalf of the six local planning authorities of Gloucestershire (October 2019) *Gloucestershire Local Housing Needs Assessment 2019*

²⁴ Cheltenham, Cotswold, Forest of Dean, Gloucester, Stroud and Tewkesbury Councils (March 2017) *Gloucestershire Gypsy and Traveller Accommodation Assessment*

²⁵ Ministries of Housing, Communities & Local Government (September 2019) *Local Authority District Summaries* Online at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

²⁶ Gloucestershire County Council (March 2016) *Indices of Deprivation 2015 Gloucestershire*

²⁷ DCLG (Accessed September 2019) *Indices of Deprivation 2015 and 2019 explorer* Online at: http://dclgapps.communities.gov.uk/imd/iod_index.html

²⁸ DCLG (2019) *Indices of Deprivation: 2019 and 2015* Available at: http://dclgapps.communities.gov.uk/imd/iod_index.html

²⁹ ONS (March 2021) UK House Price Index: January 2021. Available at: <https://www.ons.gov.uk/economy/inflationandpriceindices/bulletins/housepriceindex/january2021>

house prices are 8.7 times earnings as at 2020, compared to 3.7 times earnings in 1997³⁰. This is in line with the trend across much of the country with housing affordability worsening in all local authority districts. On average, working people could expect to pay around 7.8 times their annual earnings on purchasing a home in England and Wales in 2020, up from 3.6 times earnings in 1997. As such the issue of housing affordability will need to be addressed through planning policy and future affordable housing provision in the District will need to be delivered as part of any development planned for.

- A2.28 The South West region has the lowest proportion of fuel poor homes in England with 9.4% homes reported as fuel poor in 2018 (234,177 homes). In comparison, the North West region had the highest proportion of fuel poor households with 12.1% homes reported as fuel poor (382,676 homes). The proportion of households in fuel poverty in Stroud in 2018 was recorded as 8.8% (4,587 homes). This proportion is equivalent to the county level at 8.8% (24,534 homes)³¹.

Health

- A2.29 The health of people in Stroud is varied compared with the average for England³². Early deaths from cancer amongst Stroud's population have seen a steady decline in recent years which is a nationally observed trend. Although early deaths resulting from heart disease amongst Stroud's population has seen an insignificant increase, the number of those dying early as a result of illnesses related to these ailments in the District is significantly better than the national average. The overall number of men and women dying early from all causes is also lower than the national average figure.
- A2.30 While life expectancy for both men and women is similar to the England average. In the most deprived areas of the District men are expected to live 6.5 years less and women are expected to live 3.1 years less than men and women in the least deprived areas³².
- A2.31 Stroud District also performs favourably against many other health-rated indicators in comparison to the English average. While 58.9% of adults in Stroud have been recorded as being overweight or obese, this figure is lower than the South West region (61%) and England (62%) average. The percentage of physically inactive adults in Stroud District has also remained below the Gloucestershire and England average in recent years. In Year 6, 14.9% (188) of pupils are classified as obese, better than the average for England³¹. Stroud District performs better than the English average in relation to admission for alcohol specific conditions for those under 18, with a rate of 27.9% compared to 31.6%, and 240 hospital stays for self-harm.

Culture, Leisure and Recreation

- A2.32 There is a variety of open spaces across Stroud District, including formal parks, gardens, local nature reserves, sports pitches and various informal grass areas. The distribution of notable open spaces in Stroud and the surrounding area is shown in **Figure A2.1: Recreation** at the end of this chapter. Lying to the south of the town of Stroud, Minchinhampton and Rodborough Commons are notable areas of common land covering approximately 335 hectares and are owned and managed by the National Trust. Both areas have been declared Sites of Special Scientific Interest (SSSIs), while Rodborough Common is also a Regionally Important Geological Site (RIGS) and Special Area of Conservation (SAC). Together with nearby Selsley Common (SSSI), the areas are notable examples of grassland commons in the Cotswold area.
- A2.33 At the town of Stroud, Stratford Park is 23ha with a lake and leisure centre complex. Other sizeable open spaces in the town include Old Cemetery on Bisley Road which is also a Nature Reserve, Uplands Allotments off Folly Lane and Daisy Bank park and children's play area.

³⁰ ONS (March 2020) *Housing affordability in England and Wales: 2020*. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2020>

³¹ Department for Business, Energy & Industrial Strategy (April 2020) *Sub-regional fuel poverty data 2020*. Available at: <https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2020>

³² Public Health England (Mach 2020) *Local Authority Health Profile 2019 Stroud District*

- A2.34 The Council undertook an Outdoor Playing Space Survey of Local Provision and Needs in 2013. The survey established that at the time of reporting there was a deficiency of 31.93ha in the District as per Fields in Trust standards. Deficiency was reported in terms of the provision made for youths/adults, playing pitches and equipped children's play areas. Deficiencies in overall provision were also reported at five of the eight clusters which were surveyed (Stroud Valleys, Cam/Dursley, Wotton, Gloucester Fringe and Stonehouse)³³. The adopted Stroud District Local Plan (2015) includes objectives of increasing open space provision within these areas given the deficiencies identified³⁴.
- A2.35 The Open Space, Green Infrastructure, Sport and Recreation Study 2019³⁵ examined current and projected needs of Stroud District and its residents within the context of planned sustainable growth, environmental issues, and the quest to promote active and healthy lifestyles. The report provides recommended quantity, accessibility and quality standards for open space, and key principles for GI. Although the distribution of open space varies across the District, the report identifies shortages of at least 1 typology of open space in all Parishes and clusters/sub areas. It is therefore recommended in the study that priority is placed on protecting those open spaces where there is an existing shortfall of supply. The report also recommends that new development should contribute to protecting, enhancing and creating habitats in order to provide greater ecological connectivity for both people and wildlife, both within the development site as well as the wider surrounding area. In compliance with the relevant policy in the NPPF regarding Biodiversity Net Gain, biodiversity enhancements and nature conservation should be embedded at all stages of development.

Education

- A2.36 Gloucestershire County Council acts as the Local Education Authority in Stroud. It is currently responsible for the education of more than 47,409 pupils at primary level and 39,305 pupils at secondary level as well as a further 1,229 pupils enrolled in special schools³⁶.
- A2.37 The Gloucestershire Council has produced a School Places Strategy for 2018-2023³⁷ that details any identified and potential future capacity issues at primary and secondary schools in the County, and the proposed solutions for accommodating the needs of all pupils.
- A2.38 Across the County Continue monitoring new of housing delivery is to continue in line with the strategy and S106 contributions will be sought by the County Council if appropriate. At Eastcombe in the medium term S106 provision is to be monitored at Brimscombe Port with some expansion at local school potentially required to accommodate the development at this location. At the area surrounding Stroud, Cainscross, Painswick and Stonehouse there is a requirement in the long term to monitor secondary school capacity with potential for low level demand for additional places. The County Council has also identified that in the areas surrounding Dursley and Wotton-under-Edge there will be a medium term need to monitor demand for secondary places with the potential need for bulge classes for 2019 and 2021. In all it is expected that County Council monitoring and contributions sought through S106 will help to address any capacity issues which might emerge. The most notable increases in educational demand are likely to occur at the new settlements at Sharpness and Wisloe, however, the strategy identifies that the amount of growth supported at these locations will allow for the delivery of new facilities to meet this demand.
- A2.39 The county has a total of 297 primary, secondary, and special school facilities (246, 40 and 11, respectively). Stroud College of Further Education is located within the town of Stroud and is part of a series of five campuses located in and around North Bristol and Stroud which make up South Gloucestershire and Stroud College.

³³ Stroud District Council (September 2013) *Outdoor Playing Space A Survey of Local Provision and Needs*

³⁴ Stroud District Council (November 2015) *Stroud District Local Plan*

³⁵ Stroud District Council (June 2019) *Green Infrastructure, Sport and Recreation Study*

³⁶ Gloucestershire County Council (March 2020) *Summary of School Numbers on Roll by Age*. Available at: <https://www.gloucestershire.gov.uk/education-and-learning/school-admissions-scheme-criteria-and-protocol/pupil-numbers-in-gloucestershire-schools/>

³⁷ Gloucestershire County Council (November 2018) *School Places Strategy (2018-2023)*

A2.40 In Stroud the proportion of those with qualifications equivalent to NVQ4 level and higher (45.4%) between January 2020 and December 2020 was higher than the South West regional level (40.5%) as well as the national level (43.1%). No data is available at the District level in relation to those residents who do not have a qualification; however the proportion of those within the South West region without a qualification (5.0%) is lower than the national figure (6.4%)³⁸.

Crime

A2.41 In the District it is reported that there have been 33% fewer recorded crimes than the previous 5 years up to 2016.³⁹ Police and crime prevention services are recognised as important assets to local people with 20% of respondents to the 2018 Stroud District Council Budget Consultation⁴⁰ stating that these services were the most important for their business sector or community.

A2.42 For the year ending December 2018, the crime rate in Stroud urban area presented through the Home Office statistics was 39.70 recorded crimes per 1,000 population. This figure was recorded as being significantly lower than the average for Gloucestershire force area which was 92.72 recorded crimes per 1,000 population for the same year period.⁴¹ Violence with injury, theft and criminal damage and arson were the crimes which were most recorded in the District in the most recent reporting period. These offences accounted for 768, 1,561 and 708 recorded crimes respectively of a total of 5,390 recorded crimes during the 12 month period ending September 2020⁴².

Landscape, Biodiversity and Geodiversity

A2.43 Stroud District sits across three National Character Areas (NCAs). The bulk of land in the District is split between NCA 106 (Severn and Avon Vales) to the west and NCA 107 (Cotswolds) to the east with a small area of land to the west of Wotton-under-Edge lying within NCA 118 (Bristol, Avon Valleys and Ridges). To the west the land is described as being mostly a low lying and open agricultural vale landscape with much of the east defined by a steep scarp crowned by a high, open wold and significant portions of woodland⁴³.

A2.44 The most western portion of the District contains part of the Severn Estuary and as such is characterised by the low lying rich estuarine landscape in the Severn Vale. The exception to this low lying character towards the west is found at the hillocks that the River Severn meanders around. Much of the District is rural with lower densities of development towards this location.

A2.45 The Stroud District Landscape Assessment⁴⁵ identifies a number of landscape character types for the District. These are split between the Cotswold Upland Landscapes to the east and Severn Vale Lowland Landscapes to the west. Each of the landscape character types has a series of key characteristics and key priorities for actions set out for them within the Landscape Assessment.

A2.46 Within the Cotswold Upland Landscapes the following landscape character types have been identified:

- Wolds Top;
- Rolling Valleys;

³⁸ Nomis (Accessed April 2021) *Labour Market Profile – Stroud* Online at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157376/report.aspx>

³⁹ Stroud District (Accessed March 2018) *Stroud District Community Safety Partnership Strategy 2017-2021* Online at: <https://www.stroud.gov.uk/community-and-living/community-safety-and-neighbourhood-wardens/stroud-district-community-safety-partnership-strategy-2017-2021>

⁴⁰ Future Focus Research for Stroud District Council (November 2018) *Budget Consultation 2018 Report*

⁴¹ Home Office (Accessed July 2019) *Crime in Stroud compared with crime in other similar areas* Online at: <https://www.police.uk/gloucestershire/CA1/performance/compare-your-area/?section=timeline#timeline>

⁴² ONS (September 2020) *Recorded crime data at Community Safety Partnership / Local Authority level*

⁴³ Natural England (March 2015) *NCA Profile:107 Cotswolds*

⁴⁴ Natural England (December 2014) *NCA Profile:106 Severn and Avon Vales*

⁴⁵ Stroud District Council (2000) *Stroud District Landscape Assessment*

- Secluded Valleys; and
- Escarpment.

A2.47 Within the Severn Vale Lowland Landscapes the following landscape character types have been identified:

- Rolling Agricultural Plain (including Lowland Plain, Escarpment Foothills and Frome River Valley);
- Undulating Lowlands (including Little Avon Basin, Little Avon Mid-Valley, Wooded Lowlands and Lowland Ridges);
- Severn Vale Hillocks;
- Severn Vale Grazing Marshes;
- Sandstone Ridge;
- Triassic Ridge;
- Wooded Cambrian Ridge; and
- Kingswood Vale (including Kingswood Vale – north and Kingswood Vale – south).

A2.48 The adopted Stroud District Plan was supported by a Landscape Sensitivity Appraisal which appraised Potential Locations for growth (housing, mixed-use and employment). Those locations appraised as having the highest potential sensitivity to growth were those at Nortonwood by Nailsworth and to the east of Stonehouse. Locations which were identified as having a potential medium-high sensitivity to growth were those to the west of Cam, east of Rodborough and north of Stroud⁴⁶.

A2.49 As part of work to support the Council's SALA, landscape sensitivity assessment work was undertaken across the District at locations around the principal settlements. This found that those land parcels within the Cotswolds AONB generally have higher sensitivities than those parcels outside of the designation. As such, many of the locations which have lower sensitivities in terms of landscape were identified at settlements to the west such as at Stonehouse, Eastington, Hardwicke and Cam (north)⁴⁷ in particular.

A2.50 The eastern portion of the District contains the Cotswolds AONB which covers just over half of its total land area. The boundary of the AONB is drawn to exclude many of the areas which display higher levels of development along the A419 corridor at Stonehouse and Stroud and towards Brimscombe, as well as along the A46 towards Nailsworth and at Cam and Dursley.

A2.51 The AONB is characterised by its dramatic escarpment and expansive high wolds in particular and contains a number of nationally and internationally designated biodiversity assets. These include Rodborough Common (SAC and SSSI), Minchinhampton and Selsley Commons (SSSI) to the south of Stroud town and the areas of beech woodland which are present towards the boundary with Tewkesbury Borough which contain Cotswold Commons and Beechwoods NNR and SSSI as well as Cotswold Beechwoods SAC⁴⁸. The Cotswolds Beechwoods SAC is recognised as potentially being particularly vulnerable to recreational pressures. The site is close to the city of Gloucester to the north west and is also accessible from the town of Stroud to the south.

A2.52 The Cotswolds AONB Management Plan 2018-2023 was adopted by the Cotswolds Conservation Board in September 2018 to provide a vision for the future management of the area. The plan sets a vision for the AONB in 2043 as a "Distinctive, unique, accessible living landscape treasured for its diversity which is recognised by all for its wide open views, dry stone walls, intimate valleys, flower rich grasslands, ancient woodlands, dark skies, tranquillity, archaeology, historic and cultural heritage and distinctive Cotswold stone architecture." Together with the plan's objectives, the policies set out in the document have the main purposes of conserving and enhancing the natural beauty of the Cotswolds AONB; increasing the understanding and

⁴⁶ URS on behalf of Stroud District Council (July 2013) *Landscape Sensitivity Appraisal*

⁴⁷ Stroud District Council (December 2016) *Stroud District Landscape Sensitivity Assessment*

⁴⁸ Joint Nature Conservation Committee (January 2016) *Natura 2000 - Standard Data Form: Cotswold Beechwoods*

enjoyment of the special qualities of the AONB; addressing issues that are having an adverse effect on the AONB and achieving the vision and outcomes of the Management Plan.

- A2.53 Given the close proximity of the AONB to larger towns and cities and the trend towards a growing and ageing population the management plan has identified increasing pressures on the area in terms of the need to provide housing, employment and services. Citing evidence of this trend, the plan highlights that between 2012 and 2017, more housing schemes – and more housing units – were approved in the Cotswolds AONB than in any other AONB in England⁴⁹.
- A2.54 The Gloucestershire Nature Map sets out a vision for a robust ecological network in the County. Strategic Nature Areas (SNAs) have been identified through this work as selected landscape-scale areas of land which show where the characteristic habitats which typify the County can be expanded and linked to protect and enhance biodiversity assets. The Nature Map shows that within Stroud District there are important areas for wildlife within SNAs. These include areas for wet grassland (including areas for traditional orchards) mostly to the west towards the River Severn and along parts of a number of the other smaller water bodies (including the Berkeley Pill/Little Avon, River Cam and River Frome) as well as areas for woodland mosaic and lowland calcareous (limestone) grassland mostly towards the east and the edge of the Cotswolds AONB.
- A2.55 The SNAs within the County have been grouped together within Priority Landscapes where appropriate through work by the former Gloucestershire Biodiversity Partnership in 2010. In total six Priority Landscapes which contain important ecosystems and ecological networks have been identified. Within Stroud, Severn Vale has been identified as one of these areas recognising it as part of the "wildlife highway" with an overall aim to restore a continuous expanse of lowland wet grassland and other wetland habitats⁵⁰.
- A2.56 Based on the work to identify the SNAs through the Nature Map the Severn Vale as defined by the flood plain of the River Severn has also been set out as a national Nature Improvement Area (NIA)⁵¹ as per the direction of Defra's Natural Environment White Paper. Cotswolds Scarp NIA also partly falls within the district boundary towards the east taking in the settled valleys in the District around the town of Stroud up to Ebrington Hill in Cotswold District. Such areas have been identified given that they provide good opportunities for ecological network restoration and improved habitat management.
- A2.57 Where the Severn Estuary passes into the western portion of Stroud, a number of important nationally and internationally designated biodiversity sites have been designated. The area has been declared as a Ramsar site, a SSSI, SAC and Special Protection Area (SPA). The Severn estuary is exceptional in that it has the second largest tidal range in the world. The estuary area has been recognised for importance for habitats including sandbanks, mudflats and sandflats, Atlantic salt meadows, and Reefs⁵². Severn Estuary SSSI is generally in favourable condition with 95.88% of the units reported on meeting the criteria for favourable or unfavourable recovering condition⁵³.
- A2.58 Habitats Regulations Assessments (HRAs) undertaken by Stroud District Council have concluded that proposed residential growth identified in the existing Local Plan within a defined catchment zone around Rodborough Common SAC and Severn Estuary SAC/SPA/Ramsar could have a likely significant effect in terms of recreation pressures on their areas, in the absence of appropriate mitigation. Stroud District Council has therefore worked with Natural England, landowners and other bodies to develop appropriate avoidance strategies which involve all housing developments within identified catchment zones paying per net additional dwelling to fund alternative recreation provision elsewhere or to mitigate the effects on-site through funding appropriate management

⁴⁹ Cotswolds Conservation Board (September 2018) *Cotswolds AONB Management Plan 2018-2023*

⁵⁰ Gloucestershire Local Nature Partnership (Accessed March 2018) *Priority Landscapes* Online at: <http://gloucestershirenature.org.uk/actionplan/priority-landscapes.php>

⁵¹ Gloucestershire Local Nature Partnership (August 2016) *Nature Improvement Areas In Gloucestershire*

⁵² Natural England (February 2016) *European Site Conservation Objectives for Severn Estuary*

⁵³ Natural England (July 2019) *SSSI Condition Summary Site: Severn Estuary SSSI* online at: <https://designatedsites.naturalengland.org.uk/ReportConditionSummary.aspx?SiteCode=S1002284&ReportTitle=Severn%20Estuary%20SSSI>

activities⁵⁴⁵⁵. A separate Habitats Regulations Assessment for the new Local Plan has been undertaken.

- A2.59 Gloucestershire has some of the most varied geology seen within the U.K. The District of Stroud takes in parts of the Cotswolds escarpment at its eastern edge. Within this portion of the District the rocks evident are from mainly the Quaternary (Alluvium, River Terrace Gravels and Glacial Deposits), and Jurassic periods (Oxford Clay and Kellaway Beds, Great Oolite Group, Inferior Oolite Group, Whitby Mudstone, Marlstone Rock, Dyrham and Charmouth Mudstone). To the west within the portion of the District which falls within Severn Vale there is geological evidence of the Quaternary (Alluvium, River Terrace Gravels and Glacial Deposits), Jurassic (Charmouth Mudstone and Blue Lias), Triassic (Penarth Group, Mercia Mustone Group and Sherwood Sandstone), Permian (Bridgnorth Sandstone), Devonian (Old Red Sandstone), Silurian (Ludlow, Wenlock and Llandovery) and Ordovician periods (Igneous intrusions, Breadstone Shales and Bronsil Shale)⁵⁶.
- A2.60 The Cotswold Hills Geopark which was formed in 2004 takes in areas towards the east of the District. In its entirety the boundaries stretch from Stroud in the south west towards areas outside of the District at the settlements of Tetbury and Cirencester in the south east and Bourton on the Water and Chippin Campden in the east and north east respectively. The geopark extends to include land within the District as far west as Painswick to the north and land around Stroud and Stonehouse as well as Cam and Dursley and Wotton-under-Edge further to the south. It comprises an area of diverse and significant geology; a swathe of land approximately 95km in length. The SSSIs of Rodborough Common, Selsley Common, Woodchester Park and Minchinhampton Common⁵⁷ are all within the geopark having been recognised at least in part for the importance of the geodiversity on display.
- A2.61 Across the entirety of Stroud there are 259 locally designated biodiversity and geodiversity sites. Of these sites 125 are in positive condition. This total is broken down between 122 Key Wildlife Sites which are in positive condition and three RIGSs which are in positive condition. In Gloucestershire 44.84% of the local sites are in positive condition as of March 2017. This represents a small decrease in those sites which were in positive condition from 2010 to 2015 when the figure was 45.17%⁵⁸. Stroud District also contains a number of Priority Habitats, protected species, Priority Species and Ancient Woodland which make a significant contribution to the District's biodiversity.

Historic Environment

- A2.62 Sustaining the high quality of townscapes in Stroud is important to defining the character of the District. Furthermore, preserving the cultural and historic environment benefits communities in additional ways:
- It provides an essential educational resource for the understanding of the past and its legacy.
 - It contributes to the national and local economy as it promotes tourism and provides jobs.
 - It provides people with a sense of belonging to a unique and special place – a sense of identity.
- A2.63 This is particularly true of Stroud where tourism is an important component of the economy. Historic England reported that in 2019, in the south west, for every £1 of gross value added (GVA) directly generated by the heritage sector, an additional £1.36 of GVA is supported in the wider economy. The total GVA added by the heritage sector in the south west for 2019 was £2.8

⁵⁴ Stroud District Council (March 2015) *Interim Strategy for Avoidance of Likely Significant Effects on Rodborough Common Special Area of Conservation (SAC)*

⁵⁵ Stroud District Council (December 2017) *Strategy for Avoidance of Likely Significant Adverse Effects on the Severn Estuary SAC, SPA and Ramsar Site*

⁵⁶ Gloucestershire Geoconservation Trust (Accessed April 2018) *Gloucestershire Geodiversity Online* at: http://www.glosgeotrust.org.uk/glos_geodiversity.shtml

⁵⁷ Cotswold Hills Geopark Partnership (Accessed April 2018) *Cotswold Hills Geopark* <http://www.cotswoldhillsgeopark.net>

⁵⁸ Gloucestershire Local Nature Partnership (Accessed August 2018) *Gloucestershire Local Sites Summary Data 2017* Online at: <http://www.gloucestershirenature.org.uk/publications/index.php>

billion (equivalent to 0.8% of the region's GVA). Furthermore, the sector supported a total of 51,727 jobs and there was a total of 23 million visitors to the region⁵⁹.

- A2.64 There are currently 42 Conservation Areas designated in the District. Of these, 15 have adopted Conservation Area Statements. Many of these areas are focussed on the more developed centre of Stroud.
- A2.65 The Industrial Heritage Conservation Area (IHCA) which covers the length of the Cotswold Canals for approximately 23km from Sapperton in the east to Saul in the west is noted as being a particularly large, complex and potentially vulnerable heritage asset. This is one of the largest conservation areas in Britain⁶⁰. The IHCA Conservation Area Statement has been adopted as a Supplementary Planning Document (SPD)⁶¹ and the IHCA also benefits from an adopted Design Guide⁶². The IHCA passes through some 19 'sub areas' identified as having distinct characteristics through the IHCA Conservation Area Statement - Volume 2: Character Parts⁶³.
- A2.66 Two of the Conservation Areas in the District are on Historic England's Heritage at Risk List as of the most recent update in 2020. These are the IHCA and Stanley Mills Conservation Areas, which are reported to be in poor and very bad condition respectively. Both designations are reported as being in 'deteriorating' condition. There is a total of 20 Conservation Areas in the south west on the Heritage at Risk List⁶⁴ meaning that those in Stroud make up 10% of the figure for the entire south west region.
- A2.67 At present there are 3,306 Listed Buildings in Stroud, with a further 69 Scheduled Monuments and 15 Registered Parks and Gardens also designated⁶⁵. Of the Listed Buildings in the District, 12 are on the Heritage at Risk List. There are a further four Scheduled Monuments on the Heritage at Risk List⁶⁶ at present in the District.
- A2.68 Details of the heritage assets (including Conservation Areas) identified as being at risk and their respective conditions are provided in **Table A2.2** below.

⁵⁹ Historic England (2020) *Heritage and the Economy: Regional profile infographics*

⁶⁰ Stroud District Council (July 2017) *A Heritage Strategy for Stroud District*

⁶¹ Stroud District Council (November 2008) *Industrial Heritage Conservation Area Management Proposals SPD*

⁶² Stroud District Council (November 2008) *The Industrial Heritage Conservation Area Design Guide*

⁶³ Stroud District Council (November 2008) *The Industrial Heritage Conservation Area Volume 2: Character Parts*

⁶⁴ Historic England (October 2020) *Heritage at Risk: South West Register 2020*

⁶⁵ Historic England (Accessed May 2021) *National Heritage List for England* online at: <https://historicengland.org.uk/listing/the-list>

⁶⁶ Historic England (October 2020) *Heritage at Risk: South West Register 2020*

Table A2.2: Heritage assets at risk in Stroud District

Designated Site Name	Heritage Category	Condition
Stanley Mills	Conservation Area	Very bad - deteriorating
Stroud Industrial Heritage (IHCA)	Conservation Area	Poor - deteriorating
Main Building at Stanley Mills	Listed Building Grade I	Fair
St Mary's House, London Road	Listed Building grade II*	Poor
Woodchester Mansion, Woodchester	Listed Building Grade I	Very bad
Church of St Mary the Virgin, Church Lane	Listed Building Grade I	Very bad
Church of St Mary, Fretherne with Saul	Listed Place of Worship grade II*	Poor
Old Mill Building at Longfords Mills	Listed Building Grade II*	Fair
Church of St James, Church Lane	Listed Building Grade II*	Very bad
Church of St Andrew	Listed Building Grade II*	Poor
Congregational Church, Bedford Street	Listed Building Grade II*	Poor
Church of St Mary Magdalene Gates and Wall	Listed Building Grade II*	Poor
Guise Mausoleum to north west of Church of St John the Baptist	Listed Building Grade II*	Very bad
Church of St John the Baptist, B4072	Listed Building Grade II	Poor
Church of St Giles, High Street	Listed Building Grade II	Poor
Bowl barrow 450m south east of Upper Hyde Farm	Scheduled Monument	Extensive significant problems - declining
Gatcombe long barrow, 400m east of Gatcombe Farm	Scheduled Monument	Generally unsatisfactory with major localised problems - declining
Bowl barrow 330m north of Symonds' Hall Farm	Scheduled Monument	Extensive significant problems - declining
Miserden Castle mound	Scheduled Monument	Generally satisfactory but with significant localised problems - declining
Bowl barrow 720m south east of Longwood Farm	Scheduled Monument	Extensive significant problems - declining

Air and Water

- A2.69 The impacts of air quality in the UK are recognised not only in terms of health alone but also associated economic impacts. In England, NHS and social care cost due to PM2.5 and NO2 combined in 2017 was estimated to be £42.88 million (based on data where there is more robust evidence for an association), increasing to £157 million when diseases are included where there is currently less robust or emerging evidence for an association. Between 2017 and 2025, the total cost to the NHS and social care of air pollution for where there is more robust evidence for an association, is estimated to be £1.60 billion for PM2.5 and NO2 combined increasing to £5.56 billion if we include other diseases for which there is currently less robust evidence for an association⁶⁷.
- A2.70 Road traffic has been identified as the primary influence on air quality in Stroud and the primary polluter of concern is Nitrogen Dioxide. The air quality in the District for 2019 was reported as being very good, however, levels of Nitrogen Dioxide recorded were higher than the levels for 2018. The increase in Nitrogen Dioxide levels over 2019 goes against the trend noted in preceding years. The reported hotspot for increased emission levels was Dudbridge. The 65.3MW

⁶⁷ Public Health England (May 2018) *Estimation of costs to the NHS and social care due to the health impacts of air pollution*

energy from waste plant at Javelin Park was reported as a new major source of emissions in the District in 2019⁶⁸.

- A2.71 There are currently no AQMAs declared in the District. An AQMA had previously been established jointly with Tewkesbury District Council for the NO₂ annual mean objective, along the M5 corridor but this was revoked in 2004 following a return of air quality to acceptable limits.
- A2.72 Much of the western portion of the District has been classified by the Environment Agency as Surface Water Nitrate Vulnerable Zones (NVZs) and/or Ground Water NVZs. Such areas are designated where land drains into nitrate polluted waters or waters which could become polluted by nitrates⁶⁹.
- A2.73 Much of the eastern portion of the District is classified as a Drinking Water Safeguard Zones (Surface Water) as it has been identified as being at risk of failing the drinking water protection objectives. There are also areas to the east (by Minchinhampton and Nailsworth and to the south of Cam and Dursley) which are also defined as Source Protection Zones given that there is a risk of contamination from any activities that might cause pollution in the area⁷⁰.
- A2.74 Facilities for the treatment of waste water in Stroud fall under the responsibility of Gloucestershire County Council. Gloucestershire Waste Core Strategy provides policies for the safeguarding of such facilities and other waste related objectives and policies up to the year 2027. There are currently 84 operational waste water treatment facilities in Gloucestershire. The two main sewage treatment works for Gloucestershire are located outside of Stroud at Netheridge in Gloucester and Hayden to the south west of Cheltenham respectively⁷¹.
- A2.75 Water quality at the Severn Estuary is an important indicator of the overall health of the Estuary's ecosystem. This indicator is also an important factor in influencing tourism, recreational activities and the commercial/industrial sectors. In recent years the closure of major industries and the introduction of stricter pollution controls has meant that the levels of most contaminant which the estuary is subject to are much lower than previously. Major industries discharging into the estuary include (or have included until recently) smelters, incinerators, fertiliser and numerous other chemical plants in the Avonmouth area; coal and steel industry, paper mills, chemical and pharmaceutical manufacturers in south Wales; and nuclear power plants at Hinkley, Berkeley and Oldbury. Dissolved oxygen levels are generally high in the estuary, with levels above 8 mg/l throughout the whole Estuary and concentrations above 95% at the seaward end with no widespread severe oxygen depletion reported. Reporting by the Environment Agency also shows that in the waters of the estuary average concentrations of dissolved metals such as cadmium, copper, nickel, lead and zinc are all below Environmental Quality Standards thresholds.
- A2.76 Water abstraction needs to be managed responsibly at the estuary to meet the reasonable needs of water users. Whilst human requirements are important there is a need to ensure that enough water remains in the environment to conserve the water body habitats. Major rivers feeding the Severn Estuary are subject to freshwater abstraction to varying degrees with the large abstraction from the Severn at Gloucester feeding the Gloucester – Sharpness Canal, requiring carefully management to prevent the uptake of saline water⁷².
- A2.77 Stroud District lies within the Severn Lower Vale and Frome and Cam Operational Catchments. The number of water bodies within each catchment and their assessed levels of ecological and chemical status is summarised in **Table A2.3** and **A2.4**^{73,74}. It can be seen that all water bodies in both catchments achieved good chemical status in 2016, but did not as of 2019. The ecological

⁶⁸ Stroud District Council (July 2019) *2019 Air Quality Annual Status Report*

⁶⁹ Environmental Agency (Accessed July 2019) *Nitrate Vulnerable Zones* Online at: http://maps.environment-agency.gov.uk/wiyby/wiybyController?x=357683&y=355134&scale=1&layerGroups=default&ep=map&textonly=off&lang=_e&topic=nvz

⁷⁰ Environmental Agency (July 2019) *Groundwater Protection Zones* Online at: http://maps.environment-agency.gov.uk/wiyby/wiybyController?x=531500.0&y=181500.0&topic=groundwater&ep=map&scale=5&location=London,%20City%20of%20London&lang=_e&layerGroups=default&distance=&textonly=off#x=419032&y=227848&lg=1,10,&scale=4

⁷¹ Gloucestershire County Council (November 2012) *Gloucestershire Waste Core Strategy*

⁷² Severn Estuary Partnership (Autumn 2011) *State of the Severn Estuary Report*

⁷³ Environment Agency (Accessed May 2021) *Severn Lower Vale Operational Catchment* Online at: <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3281>

⁷⁴ Environment Agency (Accessed May 2021) *Frome and Cam Operational Catchment* Online at: <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3194>

status in the Severn Lower Vale Catchment remained stable between 2016 and 2019. The ecological status of the Frome and Cam catchment remained relatively stable, the condition of one water body moved from moderate to poor.

Table A2.3: Ecological and chemical classification of surface waters in the Severn Lower Vale Operational Catchment

Condition	2019	2016
Ecological Status or Potential		
Bad	0	0
Poor	1	1
Moderate	6	6
Good	1	1
High	0	0
Chemical status		
Fail	8	0
Good	0	8

Table A2.4: Ecological and chemical classification of surface waters in the Frome and Cam Operational Catchment

Condition	2019	2016
Ecological Status or Potential		
Bad	0	0
Poor	0	1
Moderate	9	8
Good	2	2
High	0	0
Chemical status		
Fail	11	0
Good	0	11

Flood Risk

- A2.78 The River Severn and its tributaries are prominent features in the District and as such areas of Stroud particularly to the west display a high risk of fluvial flooding. Areas surrounding the River Severn as well as other larger water bodies such as the River Frome and Nailsworth Stream through Stonehouse, Stroud and Nailsworth as well as the River Cam through Cam and Dursley are within Flood Zone 3. Flood defences are present along much of the length of the River Severn within the District at areas to the west of Berkeley surrounding Berkeley Pill and at the areas surrounding the Gloucester and Sharpness Canal by the wetlands to the west of Slimbridge and to the west of Frampton on Severn. There is a flood storage area within the District to the north of Slimbridge and to the west of the A38.
- A2.79 Flooding events have occurred at the River Severn Estuary where land was reclaimed from high tides since the Roman times and there are records of further historic flooding events occurring across the District. These including records along the River Frome notably in July 1968 around the areas of Whitminster and Ryeford. The area towards the River Severn Estuary at Sharpness Docks was also affected by flooding during this same period. At Stroud adjacent to the Stroudwater Canal and River Frome this event resulted in further flooding. As recent as July 2007, fluvial flooding has been recorded along the Slad Brook along Painswick Stream to the north of the town. Towards the northern part of the District historic flooding events have been recorded at Shorn Brook to the south of Quedgeley.
- A2.80 The Environment Agency has produced climate change allowances to support the NPPF. This includes advice on peak river flow by river basin district. **Table A2.5** shows the Environment

Agency's⁷⁵ predicted peak river flow allowances for the Severn River Basin which is of relevance in terms of both flood risk assessments and strategic flood risk assessments. These predictions are to be made use of with consideration for the flood zone and the appropriate flood risk vulnerability classification to decide which allowances applies to certain types of development or plans.

Table A2.5 Peak river flow allowances by river basin district (using 1961 to 1990 baseline)

River basin district	Allowance category	Total potential change anticipated for the '2020s' (2015 to 2039)	Total potential change anticipated for the '2050s' (2040 to 2069)	Total potential change anticipated for the '2080s' (2070 to 2115)
Severn	H++	25%	45%	90%
	Upper end (90th percentile)	25%	40%	70%
	Higher central (70th percentile)	15%	25%	35%
	Central (50th percentile)	10%	20%	25%

- A2.81 The canal system in Stroud acts to provide flood alleviation in the District. At present water from watercourses within the Stroud District area is pumped into the Gloucester and Sharpness Canal to help manage water levels. Any failure of the canal could potentially cause or exacerbate flooding problems within the District⁷⁶. The reinstatement of the Stroudwater Canal is part of the current strategy to remove brownfield allocated development sites within the Stroud Valleys out of the floodplain.
- A2.82 Stroud District Council has led on the Stroud Rural SuDS project to use Natural Land Management techniques to reduce flood risk while enhancing water quality and biodiversity in the River Frome Catchment. Such techniques include promoting water attenuation, infiltration and slowing channel flow using woody debris dams⁷⁷. As the Lead Local Flood Authority for the area, Gloucestershire County Council has identified parishes and wards in Stroud and the other local authority areas which are considered to be of priority in terms of alleviating flood risk prioritising residential properties over non-residential. Within Stroud District Arlingham Civil Parish (CP), Brimscombe and Thrupp CP, Cainscross CP, Cam CP, Chalford CP, Dursley CP, Eastington CP, Fretherne with Saul CP, Hardwicke CP, Kingswood CP, Minchinhampton CP, Rodborough CP, Stonehouse CP, Stroud CP and Wotton-under-Edge CP all lie within areas which have been identified as having medium-high or high risk of flooding⁷⁸.

Energy and Climate Change

- A2.83 Stroud District Council declared a climate change emergency in November 2018 and pledged to make the Stroud district carbon neutral by 2030. The 2030 Strategy set out how the Council intends to begin to implement that pledge to help the District adapt to future climate change that will occur due to the level of carbon dioxide already in the atmosphere⁷⁹.
- A2.84 Stroud District Energy Strategy has been developed to "improve the energy efficiency across its housing stock portfolio". Within the District it is estimated that approximately 1,700 (30%) of homes will require significant investment to improve energy efficiency given that they are either

⁷⁵ Environment Agency (Accessed May 2021) *Flood risk assessments: climate change allowances* Online at: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

⁷⁶ Stroud District Council (March 2012) *Strategic Flood Risk Assessment for Local Development Framework Level 2*

⁷⁷ Gloucestershire County Council (October 2018) *Local Flood Risk Management Strategy Annual Progress and Implementation Plan 2019/20 – 2020/21*

⁷⁸ Gloucestershire County Council (November 2017) *Local Flood Risk Management Strategy Annual Progress and Implementation Plan 2019/20 – 2020/21*

⁷⁹ Stroud District Council (March 2021) *The 2030 Strategy: Limiting, Adapting, Recovering and Responding in a Changing Climate*

off the gas network, of solid wall construction, of non-traditional construction, have no loft space and/or are located within restricted locations such as conservation areas or the AONB⁸⁰.

- A2.85 850 Renewable Heat Incentive (RHI) eligible installations were established in Gloucestershire between April 2014 and January 2017. These include heating sources such as biomass boilers, solar water heating and certain heat pumps. Significant proportions (269) of these were established in Stroud during this period. Stroud has the highest rate of heat pump installations in the Country with 1.4% of households having a heat pump.
- A2.86 In terms of renewable electricity, the Feed-in Tariff register shows that Stroud District has the highest number of domestic renewable installations in Gloucestershire with a total of 2,646 comparative to the next highest total for Forest of Dean District which is 1,948. These installations have predominantly been solar photovoltaic and it is estimated that the District has 530 solar photovoltaic installations per 10,000 households. The average number of solar photovoltaic installations per 10,000 households for Gloucestershire is just over 250⁸¹. The number of installations for renewable energy generation for District is show in **Table A2.6**.

Table A2.6: Installed capacity of sites generating electricity from renewable sources in Stroud District, end 2019

Site type	Site number
Photovoltaics	2,996
Onshore Wind	11
Hydro	5
Anaerobic Digestion	-
Offshore Wind	-
Wave/Tidal	-
Sewage Gas	1
Landfill Gas	1
Municipal Solid Waste	1
Animal Biomass	-
Plant Biomass	1
Cofiring	-
<i>District total</i>	<i>3,016</i>

- A2.87 The South West region (3,954.0MWe) has the fourth highest installed capacity of sites generating electricity from renewable sources, trailing Yorkshire and Humber (6,269.2MWe), East England (5,580.4 MWe) and South East England (4,268.2MWe). The South West has the highest installed capacity of solar photovoltaic (3,254.0MWe) of all regions in England⁸². Javelin Park Energy from Waste facility by Haresfield was reported as one of the largest new schemes for renewable energy sources in 2019, which accounted for an increased capacity of 15 MW in the South West region⁸³.
- A2.88 Stroud District has seen a steady fall in CO₂ emissions per capita from 2005 to 2018 with records for these years showing 8.9t CO₂ and 6.3t CO₂ respectively for those emissions within the scope of the local authority. Of the total CO₂ emissions within the scope of the local authority in 2018 (744.4kt CO₂ 400.7kt CO₂ were as a result of transport⁸⁴.
- A2.89 While the overall trend in the District is towards a reduced rate of CO₂ emissions per year from 2011 to 2018, taking into account all sources of transport CO₂ emissions Stroud has seen an increase in those CO₂ emissions attributed to journeys made on motorways (228.5kt CO₂ to 231.2kt CO₂) and minors roads (84.5kt CO₂ to 88.9kt CO₂). The decrease recorded in overall CO₂ emissions in the District is reflective of the national trend with CO₂ emissions recorded as 744.4kt CO₂ for 2018 which was a decrease of 1.61% from the previous year⁸⁵. A significant proportion of

⁸⁰ Stroud District Council (March 2017) *Energy Strategy*

⁸¹ Cheltenham Borough Council, Forest of Dean District Council, Gloucester City Council, Stroud District Council and Tewkesbury Borough Council April 2017) *Home Energy Conservation Act Report April 2017- March 2019*

⁸² ONS (September 2020) *Regional Renewable Statistics*

⁸³ Department for Business, Energy & Industrial Strategy (September 2020) *Renewable electricity in Scotland, Wales, Northern Ireland and the regions of England in 2019*

⁸⁴ ONS (June 2017) *UK local authority and regional carbon dioxide emissions national statistics: 2005-2018*

⁸⁵ ONS (June 2017) *UK local authority and regional carbon dioxide emissions national statistics: 2005-2018*

the decrease in CO₂ emissions during the past decade can be attributed to the decrease in the use of coal for electricity generation.

- A2.90 The UK has experienced a general trend towards warmer average temperatures in recent years with the most recent decade (2009–2018) being on average 0.3C warmer than the 1981–2010 average and 0.9C warmer than 1961–1990. The 21st century is reported so far as being warmer than the previous three centuries.
- A2.91 Heavy rainfall and flooding events have been demonstrated to have increased potential to occur in the UK as the climate has generally become wetter. For example, the highest rainfall totals over a five day period are 4% higher during the most recent decade (2008–2017) compared to 1961–1990. Furthermore, the amount of rain from extremely wet days has increased by 17% when comparing the same time periods. In addition, there is a slight increase in the longest sequence of consecutive wet days for the UK. In Winchester precipitation levels for spring 2018 were higher than the 1981–2010 average, with some areas experiencing levels 150% and 170% of the 1981–2010 average. The precipitation levels for summer and autumn 2018 were lower than the 1981–2010 average, mostly between 90% to 70% of that figure, with parts of Winchester experiencing 70% to 50% of the 1981–2010 average in summer 2018⁸⁶.
- A2.92 Changes to the climate will bring new challenges to the District's built and natural environments. Hotter, drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. UK CP18 projections for the Severn River Basin identify the following main changes (relative to 1981–2000) to the climate by the end of the plan period (2038)⁸⁷:
- Increase in the mean winter temperature by 0.9 degrees.
 - Increase in the mean summer temperature by 1.1 degrees.
 - Increase in mean winter precipitation by 5%.
 - Decrease in mean summer precipitation by -12%.
- A2.93 The 2018 Intergovernmental Panel on Climate Change (IPCC) identified a reduced timeframe to act to keep world temperature rises to 1.5 degrees Celsius before 2050 in line with the Paris Agreement⁸⁸.
- A2.94 The Tyndall Centre⁸⁹ has undertaken work to calculate the 'fair' contribution of local authorities towards the Paris Climate Change Agreement. Based on the analysis undertaken the following recommendations have been made for Stroud:
- The District should stay within a maximum cumulative carbon dioxide emissions budget of 4.7 million tonnes (MtCO₂) for the period of 2020 to 2100. It should be noted that at 2017 carbon dioxide emission levels, Stroud would use this entire budget within 6 years from 2020.
 - The District should also initiate an immediate programme of carbon dioxide mitigation to deliver cuts in emissions averaging a minimum of -13.6% per year to secure a Paris aligned carbon budget.
 - The District should reach zero or near zero carbon no later than 2041.

Soils

- A2.95 The Agricultural Land Classification (ALC)⁹⁰ system provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations on agricultural use. The principal factors influencing agricultural production are climate, site and soil. These factors together with interactions between them form the basis for

⁸⁶ Royal Meteorological Society (2019) *State of the UK Climate 2018*

⁸⁷ UK Climate Projections 2018, using 2030–2049 time horizon 50th percentile and RCP 6.0 Online at: <https://www.metoffice.gov.uk/pub/data/weather/uk/ukcp18/science-reports/UKCP18-Key-results.xlsx>

⁸⁸ United Nations Treaty Collection (2016) *Paris Agreement*

⁸⁹ Tyndall Centre (2020) *Setting Climate Commitments for Stroud: Quantifying the implications of the United Nations Paris Agreement for Winchester*

⁹⁰ Natural England (December 2012) *Agricultural Land Classification: protecting the best and most versatile agricultural land*

classifying land into one of five grades, where 1 describes land as 'Excellent' (land of high agricultural quality and potential) and 5 describes land as 'Very Poor' (land of low agricultural quality and potential). Land falling outside of these scores is deemed to be 'primarily in non-agricultural use', or 'land predominantly in urban use'.

- A2.96 Most of the land in Stroud District is classed as Grade 3 (Good to Moderate) Agricultural Land. Relatively large areas of Grade 2 (Very Good) Agricultural Land are present in Stroud most notably to the west by Slimbridge, Frampton on Severn, Arlingham and the parish of Elmore. There are swathes of land which are Grade 4 (Poor) Agricultural Land mostly towards the central and eastern parts of the District by the town of Stroud and southerly towards Cam and Dursley.
- A2.97 The Council maintains a list of the previously developed land in the District which is considered appropriate for residential development as per The Town and Country Planning (Brownfield Land Register) Regulations 2017. The Stroud District Brownfield Land Register contains those sites of at least 0.25ha in area and those capable of supporting at least 5 dwellings with further information available relating to those sites which would be considered suitable for a grant of permission in principle for residential development. Many of these sites are located within the more developed locations of the District particularly Stroud and Stonehouse and within the industrial bottoms of the Stroud Valleys. The largest of these brownfield sites which does not have planning permission is the former Standish Hospital site which is 13.07ha at the edge of Standish⁹¹. Other brownfield sites without planning permission that are over a hectare include Stanley Mills (4.85ha), Rooksmoor Mills (1.09ha), Daniels Industrial Area (2.52ha), Dark Mills (1.48ha) and Locks Mill (1.18ha).

Resource Use/Waste and Recycling

- A2.98 In 2012 Gloucestershire County Council adopted the Gloucestershire Waste Core Strategy to guide future waste management development throughout up to 2027. The Waste Core Strategy should be read in conjunction with the remaining save policies of the Gloucestershire Waste Local Plan 2002-2012. Most of the County's waste arises in or near to a central corridor set out in the Core Strategy particular at Gloucester and Cheltenham and to a lesser extent Tewkesbury and Stroud. The Waste Core Strategy allocates two strategic sites within the District boundaries at Javelin Park, Harefield and Moreton Valence respectively⁹². The Gloucestershire Waste Core Strategy (WCS) indicates, however, that local capacity is presently sufficient to meet the county's landfill needs through to at least the end of the 2020s.
- A2.99 In Gloucestershire responsibility for waste management is shared between the County Council, which is responsible for waste disposal and the individual District, City and Borough Councils which have responsibility for collecting household waste. The Gloucestershire Waste Partnership is a partnership of all seven District, City and Borough Councils who work together to provide waste management services across the County⁹³.
- A2.100 Stroud District Council region was ranked as having the highest household recycling rate in the South West in 2019/20, with 60% of waste being recycled. This is an increase from 2018/19 of over 10%. Within the South West, 49.5% of waste was recycled in 2019/20 compared to 43.8% within England.
- A2.101 Gloucestershire County Council set a target of reducing waste produced by residents to 228kg per person by 2020. Stroud District Council has reported that this target has already been met with waste per resident reduced to 114kg. This has been achieved by increasing household rates of recycling and composting for glass, plastics and cans (from 1.96kg to 2.14kg per person), for paper and cardboard (from 2.34kg to 2.49kg per person) and food composting (2.25kg per person following its introduction)⁹⁴.

⁹¹ Stroud District Council (May 2021) *Stroud District Brownfield Land Register* Online at: <https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/brownfield-land-register>

⁹² Gloucestershire County Council (November 2012) *Gloucestershire Waste Core Strategy*

⁹³ Gloucestershire Waste Partnership (July 2009) *Gloucestershire Waste Partnership - Partnership Agreement*

⁹⁴ Stroud District Council (March 2017) *Recycling More And Reducing Waste*

Employment and Economic Activity

- A2.102 Between January 2020 and December 2020, the percentage of economically active people in Stroud was 82.3%⁹⁵. This is above the national average of 79.1%, and the regional average of 81.0%. During the same period, the unemployment rate of 3.8% of the economically active population across the South West region was lower than the national average of 4.6%. The number of people claiming Jobseeker's Allowance or Universal Credit as a percentage of the working age resident population as of December 2020 was 3.8% in Stroud which is lower than the regional (5.1%) and national figures (6.5%) for the same period.
- A2.103 The two main employment sectors within Stroud between January 2020 and December 2020 were associate professional and technical occupations (17.1%) and professional occupations (24.1%). Of the 5,995 enterprises within Stroud in 2020, 86.2% were considered as 'micro' size (0-9 employees), 11.6% were considered to be 'small' (10-49 employees), 1.9% were considered to be 'medium' (50-249 employees) and 0.2% were considered to be 'large' (250+ employees).
- A2.104 In 2020, the average gross weekly pay for residents for aged 16 and above in full time work in Stroud was £564.8. This figure is higher than the regional average (£550.1), but not the national average of £586.7⁹⁶. From census data across the individual authorities of Gloucestershire, Stroud recorded the highest median earned income which was £28,017, comparative to the county figure of £26,012⁹⁷.
- A2.105 The District sees large flows of commuters travelling into and out of the District with a daily net flow of 7,239 workers out of the District. The most important employment locations for people in the District which are outside of its boundaries include the areas of Gloucester City, South Gloucestershire, Cotswold, Cheltenham, Tewkesbury and City of Bristol. Stroud has negative commuter flows with all of these areas as recorded in the most recent census and shown in **Table A2.7** below⁹⁸. Internal commuter flows show that the towns of Stroud and Stonehouse and to a lesser extent Cam and Dursley and Nailsworth are important employment centres within the District for residents⁹⁹.

Table A2.7: Daily commuter flows into and out of Stroud District

Authority area	Number of commuters travelling out of Stroud	Number of commuters travelling into Stroud
Gloucester City	5,492	4,699
South Gloucestershire	3,132	1,568
Cotswold	2,334	957
Cheltenham	1,947	1,191
Tewkesbury	1,791	946
City of Bristol	1,511	630

- A2.106 Stroud District Council is a key local authority stakeholder in the Gloucestershire Local Enterprise Partnership (LEP). The Strategic Economic Plan (SEP) for Gloucestershire 2.0 carries forward many of the priorities set out for Gloucestershire in 2014 through the first SEP. The aim is to grow the local economy by an average of 4.8% GVA per annum by 2022: These priorities include attracting and retaining successful businesses in high value sectors, provide and nurturing the next generation of individuals in sectors with high growth potential and delivering digital and integrated transport connectivity to meet the future needs of businesses and people of Gloucestershire. The SEP reports that Gloucestershire has seen above average growth in productivity in growth since 2015-16¹⁰⁰.

⁹⁵ Nomis (Accessed May 2021) *Labour Market Profile – Stroud* Online at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157376/report.aspx>

⁹⁶ Nomis (Accessed July 2019) *Labour Market Profile – Stroud* Online at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157376/report.aspx>

⁹⁷ Local Authorities of Gloucestershire (March 2014) *Strategic Housing Market Assessment Update*

⁹⁸ ONS (2011) *Census WU03UK - Location of usual residence and place of work by method of travel to work* Online at: <https://www.nomisweb.co.uk/census/2011/wu03uk/chart>

⁹⁹ ONS (2011) *2011 Census* Online at: <http://commute.datashine.org.uk>

¹⁰⁰ gFirst LEP (2018) *Strategic Economic Plan for Gloucestershire 2.0*

A2.107 ONS figures for the same measure of productivity in terms of GVA per work worked across the County from 2012 up to 2016, however, show that there has been a degree of recovery in terms of the rate of increase in productivity in Gloucestershire. For this period in Gloucestershire an increase of £26.30 to £28.60 was recorded while at the national level an increase from £27.70 to £30.10¹⁰¹ was recorded over the same time period. Viewing the LEP’s relative productivity comparative to the rate for the UK for the period (2012 to 2016) in terms of GVA per hour work indices demonstrates that productivity in the area has been growing almost as fast as that reported at a national level, as is demonstrated in **Table A2.8** below. The table shows that productivity was increasing at a markedly less favourably rate up to 2010-2011 comparative to UK levels. It should be noted that a decrease in the productivity index number of an area does not necessarily mean a decrease in productivity in actual terms but rather that the area has performed relatively worse than the rest of the UK over the period. In other words, its actual productivity level may have improved, but at a slower rate than the UK overall.

A2.108 Due to the economic impacts of the Covid-19 pandemic, the Gloucestershire Economic Growth Joint Committee has put in place a plan of action designed to preserve jobs and sustain businesses¹⁰². This includes:

- Short term – Gloucestershire Local Resilience Forum (LRF) Recovery Cell overseeing and co-ordinating the immediate needs of businesses and local communities.
- Medium term – Potentially and 18 month period supported by existing structures within the County Council.
- Longer term – business as usual approach with amended structures as required.

A2.109 A study by the Centre for Progressive Policy has modelled that GVA in Stroud could decline by 44% as a result of the pandemic¹⁰³.

Table A2.8: GVA per hour worked indices for Gloucestershire Local Enterprise Partnership comparative to UK

Year	Gloucestershire	UK
2004	100.1	100.0
2005	100.2	100.0
2006	99.5	100.0
2007	98.7	100.0
2008	97.1	100.0
2009	96.4	100.0
2010	96.0	100.0
2011	95.7	100.0
2012	95.4	100.0
2013	94.6	100.0
2014	94.5	100.0
2015	94.3	100.0
2016	94.5	100.0

A2.110 Between 2006 and March 2021, 32.30ha of land was developed in Stroud District for ‘B’ employment generating uses. The amount of ‘B’ use employment land lost to other uses during the same period was 28.44ha. From a base date of 2006, Stroud District is reported as having a net provision of employment land of about 63.04ha and a net provision of land for “B” uses of about 61.52ha in March 2018. Given that the Local Plan requirement for B class employment land for the period 2006-2031 for Stroud has been set out to be 58.00ha, a total surplus of employment land at April 2018 has been recorded as 5.04ha. Whilst this figure takes account of actual losses to other uses, there are potential losses of existing employment sites mainly to residential uses which have yet to be implemented including at Dudbridge Industrial Estate and Wimberley Mill. Six employment allocations are set out in the adopted Local Plan at Stroud

¹⁰¹ ONS (February 2018) *Subregional Productivity: Labour Productivity (GVA per hour worked and GVA per filled job) indices by UK NUTS2 and NUTS3 subregions*

¹⁰² Gloucestershire Economic Growth Joint Committee Senior Officer Group (April 2020) *Gloucestershire Post-Covid Economic Recovery Briefing*

¹⁰³ Centre for progressive policy (April 2020) *Local authorities facing the biggest immediate economic hit*

Valleys, West of Stonehouse, North East Cam, Quedgeley East, Sharpness and South of Severn Distribution Park. These sites account for a total area of 51.2ha of employment land¹⁰⁴.

A2.111 There are five town centres within the District at Stroud, Cam/Dursley, Nailsworth, Stonehouse and Wotton-under-Edge. In line with national trends the traditional role of high streets in relation to providing for a majority of shopping needs has seen a decline in the District given the rise of e-retailing, e-banking and a general shift towards the acquisition of services online. In general the town centres of the District reflect a similar or slightly lower proportion of vacant commercial properties to the national average which is 11% for a similar period (recorded at January 2017) as shown in **Table A2.9** below.

Table A2.9: Total number of commercial properties and vacancy rates in Stroud's town centres (as at end of recording period 2016)

Town centre name	Total number of commercial properties	Proportion of vacant commercial properties
Stroud	320	10%
Nailsworth	116	5%
Dursley	102	9%
Stonehouse	70	9%
Wotton-under-Edge	90	10%

A2.112 Stroud town centre is by far the largest of those in the District as indicated by the number of commercial properties. The town centre, however, has a small food store offer at 4% of town centre commercial properties¹⁰⁵ and a non-food sector which may be under threat by the potential withdrawal of national retailers¹⁰⁶. The food store offer through convenience outlets is significantly lower than the national average, which is 13% of town centre commercial properties. The town does not attract a high number of national retailers and access to the centre during the evening has been identified as a barrier to the night time economy. The town does, however, benefit from a well-attended Saturday market.

A2.113 The most recent information (December 2016) relating to vacancy rates in the town centre show that 10% of commercial properties are unoccupied which is slightly higher than the previous year (8%) but slightly lower than national vacancy rate (11%) for a comparable period. Future projections relating to the make-up of the town centre suggest that it is likely to experience marked contraction of comparison floorspace as well as a reduction in the number of service units and an increase in the number of vacant commercial properties. The popularity of the market and current lack of convenience floorspace in the town centre may however provide opportunities to limit the level of underutilised space. Other potential strengths and opportunities for the town centre include capitalising on the successful integration of new housing in the town centre for "young professionals" and canal side opportunities.

A2.114 Nailsworth is the second largest centre in the District being approximately three times smaller than Stroud when considering the overall number of retail properties. It functions as a local centre with a considerable number of existing leisure and tourist uses. The centre, however, has no comparison national retailers of a large scale present but supports a numbers of cafes, independent retailers and gift shops. Vacancy levels in Nailsworth for 2016 were well below the national level at 5%, although it is worth highlighting that this figure saw a notable increase from the previous year's figure which was only 1%.

A2.115 In Dursley the number of convenience and comparison properties has remained relatively constant from 2005 to 2016. Vacancies in the centre according to the most recent available information in 2016 at 9% are similar to those observed pre-recession. Recent years have seen the number of service units decrease while leisure uses in the centre have increased slightly. Future potential opportunities for the town centre include increasing its tourism potential due to its attractive landscape setting and location on the Cotswolds Way.

¹⁰⁴ Stroud District Council (April 2020) *Employment Land Availability*

¹⁰⁵ Stroud District Council (August 2017) *Future Of Town Centres Stroud, Nailsworth, Stonehouse, Dursley, Wotton-Under-Edge*

¹⁰⁶ Stroud District Council (September 2017) *Stroud District Local Plan Review: Issues and Options Paper*

- A2.116 Comparison and convenience uses in Wotton-under-Edge have remained relatively constant in recent years, which is similar to the trend identified in Dursley. The trend towards a slight increase in the leisure offer of the town has also been recorded while the number of service uses has fallen reflecting a withdrawal of banking uses from the centre. While there has been a significant increase from the 4% figure for 2005, the percentage of vacant uses in Wotton-under-Edge is broadly in line with smaller towns in the District given that it is recorded as 10% for 2016. As the town sits at the southern historic gateway to the Cotswolds there may be potential to identify potential growth opportunities for its tourism offer.
- A2.117 Stonehouse is the second larger town in the District by population but it has the fewest number of total retail outlets. The proportion of convenience uses in the town have remained relatively constant in recent years while there has been growth in leisure uses and a decrease in the proportion of service uses. This is in line with a number of the other smaller town centres in the District and leisure uses rose from 18% of commercial uses in 2005 to 20% in 2016 in the town while the proportion of service uses fell from 31% in 2005 to 21% in 2016. Options for marketing for the town centre include its promotion as benefiting from strong links to the A38/M5 corridor and as an entrance to the Stroud valleys.
- A2.118 It is expected that new retail commitments outside the District's boundaries will have a further impact on the demand for retail capacity within the town centres of Stroud. These include a new John Lewis store which is to open in Cheltenham and a further 100,000 sqft retail offer which is to be developed in the town. Further retail developments which have the potential to impact on the role of town centres in the District include the expansion of the sub regional shopping centre at Cribbs Causeway and the expansion of the retail offer at Gloucester Docks¹⁰⁷.
- A2.119 In total, 2640 sqm of convenience goods floorspace capacity and 4840sqm of comparison goods floorspace capacity by 2031 has been forecasted as required for the District by the Town Centres and Retailing Study and Update¹⁰⁸. The majority of this capacity is to be delivered at Stroud where 1,390sqm net additional convenience floorspace capacity and 3,630sqm net additional comparison floorspace capacity are required.

Transport

- A2.120 The District has motorway access towards its western edge at the M5 junctions 12 (Gloucester) and 13 (Stroud). The A38 runs parallel to this route through the length of the District. These routes run south towards Bristol and the M4 and M48 which then provide access to South Wales. To the north the A38 and M5 provide access to Gloucester as well as Cheltenham and Worcester and further afield towards Birmingham. There are current capacity issues at peak times at junctions 12, 13 and at 14 serving the south of the District within South Gloucestershire.
- A2.121 The town of Stroud is accessible from these routes via the A419 which first passes through Stonehouse. The A419 between the M5 Junction 13 and Stroud currently experiences significant congestion and delays with Gloucestershire County Council considering proposals for improvements to address these issues¹⁰⁹. The road network through the Cotswolds AONB to the east is less developed consisting of a network of smaller A-roads, B-roads (most notably the A4173, A46 and portion of the A419 to the east of Stroud) and narrow country lanes many of which converge towards the larger settlements outside the AONB's boundaries at Stroud towards the north and Cam and Dursley to the south.
- A2.122 The District is also served by a railway station at Cam and Dursley on the mainline between Bristol and Birmingham and railway stations at Stonehouse and Stroud linking to Birmingham and to the south via Swindon to the Great Western Mainline which runs westwards from London Paddington to Bristol Temple Meads.
- A2.123 The medium term priorities for Network Rail in Gloucestershire include exploring effective approaches to station development and stopping patterns on the Bristol-Gloucester line, with

¹⁰⁷ Stroud District Council (February 2017) *Environment Committee Agenda Paper: Future of Town Centres Stroud, Nailsworth, Stonehouse, Dursley, Wotton Under Edge*

¹⁰⁸ GVA on behalf of Stroud District Council (July 2013) *Stroud Retail Study Update 2013*

¹⁰⁹ Gloucestershire County Council (August 2017) *Stonehouse A419 Improvements Full Business Case*

options for improvements including the development of the existing Cam and Dursley station over the period 2019-2029. The plan also seeks to improve sustainable connectivity to Stroud to Swindon in the interest of increasing economic growth. Wotton-under-Edge and Kingswood, which are settlements with poor access to public transport, may benefit from a new Metrowest station with connectivity to Gloucester and Bristol. Potential new station(s) at Hunt's Grove and/or Stonehouse are to be investigated as long term priorities (i.e. beyond 2029)¹¹⁰. The currently adopted Local Plan¹¹¹ (Site Allocations Policy SA4) safeguarded land for the provision of a potential future railway station at the Hunts Grove Extension. The adopted Local Plan (Site Allocations Policy SA2) also safeguarded land for a new railway station at Stonehouse Bristol Road.

A2.124 The Local Plan identifies a number of existing cycle routes for protection from harmful development:

- The Eastington to Chalford cycle route.
- The Eastington to Nailsworth cycle route.
- The Cam and Dursley cycle route (and any proposed future extension to Uley).
- The National Cycle Network Route 41 (Bristol to Stratford) and Route 45 (Salisbury to Chester) which cross the District and connecting routes to and from the Stroud Valleys Pedestrian Cycle Trail and the Cam and Dursley cycle route.

A2.125 The District is currently served by a network of Public Rights of Way (PRoWs) which provide access to the Cotswolds AONB to the east. The National Trail Cotswold Way which passes along the western edge of the AONB begins at Bath before running into the southern portion of Gloucestershire by Wotton-under-Edge. It provides access by foot to Cam and Dursley and Stonehouse. Stonehouse is one of the few locations can easily be accessed by public transport in the District meaning that it is potentially an important link for tourists making use of this route. The Cotswolds Way passes in close proximity to Cheltenham to the north of the District before finishing at Chipping Campden. A dense network of footpaths and bridleways also provide access by alternative modes of transport beyond this route.

A2.126 The length of the Stroudwater Navigation is accessible to the public, providing walking and cycling routes along the towpath apart from at two locations. At present a one mile section between Westfield Bridge and Bristol Road Wharf by the M5 motorway and one other much shorter section by the River Severn at Framilode Swing Bridge do not provide access to such routes. The section of the canal by the M5 motorway is currently subject to plans to be reinstated which would include the provision of a new surfaced towpath.

A2.127 The strategy for transport provision within the District is set out through Gloucestershire Local Transport Plan 2020-41 with Gloucestershire County Council acting as the local transport authority. Important development proposals for Stroud (some of which have confirmed funding to proceed) set out in the Local Transport Plan include improvements to the A419 corridor, the B4066 corridor and Dursley Relief Road. Gloucestershire County Council is to produce a Local Cycle and Walking Investment Strategy in roll out phases with phase 2 to cover Stroud and Tewkesbury. During 2020, draft networks were established in Stroud, which will be consulted on and published in 2021. Strategic Cycle Highway improvements in the County are targeted for the M5 Growth Zone and are eventually to link Gloucester to Stroud¹¹². Specific locations within Stroud District which would benefit from improvements for cycle access include between Chalford and Cirencester, Stroud and Chalford and Eastington and Nailsworth¹¹³.

A2.128 Within Gloucestershire approximately 17% of households do not own a car. This is significantly lower than the national average of 26%. At the county level, however, the percentage of those who cycle to work is 4.5% which is above the national average of 2%. It is also reported that across the county much of the population are located within 5km of services, employment opportunities and education which would be accessible by bicycle. Within Stroud, 50% of the

¹¹⁰ Gloucestershire County Council (March 2021) *Gloucestershire's Local Transport Plan 2020-2041*

¹¹¹ Stroud District Council (November 2015) *Stroud District Local Plan*

¹¹² Gloucestershire County Council (December 2017) *Local Transport Plan Implementation Report 2017*

¹¹³ Gloucestershire County Council (March 2021) *Gloucestershire Local Transport Plan 2021-2041 Gloucestershire's Cycle Network*

people leave the District to go to work and 75% of commuters travel to work by car. The average distance travelled to work is 17km, but 27% of people travel less than 5km to work¹¹⁴.

A2.129 Stroud District Council has recently announced plans to invest in two cycling and walking projects: a cycle track linking Uley, Dursley and Cam with the Cam and Dursley railway station. The Cam, Dursley and Uley Greenway cycle route is currently being worked on by volunteers; and a cycle track from Sustrans national network 41 to Stonehouse Wharf, Ebley, Stroud, Thrupp and Brimscombe Port. The path will also have sections leading to Stonehouse, Stonehouse railway station, Stroud railway station and Nailsworth.

A2.130 Specific emerging pressures within the Cotswolds AONB relate to increasing traffic volume and vehicle sizes which result in greater air and noise pollution as well as detrimental impacts on tranquillity, roadside verges, drainage. The AONB also faces potential pressures from non-motorised users travelling on foot, by bike or on horse. The good level of access to the AONB from nearby railway stations and international airports of Bristol, Birmingham and Heathrow as well as from military airports of Fairford and Brize Norton and the more local Gloucestershire, Oxfordshire and Cotswolds airports are likely to continue to have both positive and negative impacts on the AONB¹¹⁵.

Tourism

A2.131 In Stroud District, business rate figures show that £18,870,666 of income is generated through the service sector. This includes revenue from campsites and hotels as well as licensed premises, markets, restaurants, shops, museums, clubs and community and sports facilities and represents 28% of the total revenue for the District.

A2.132 Across Gloucestershire, the total visitor related spend for tourists in 2018 was £1,161,272,000. The figure for Stroud District was £149,487,000 for the same period. The estimated number of jobs supported by the tourist trade in the District was 3,013 which accounted for 5% of all employment in Stroud. Day visits in the District were split fairly evenly between both countryside visits (1,357,000) and urban visits (1,414,000) demonstrating the variety of attractions in Stroud. Stroud was, however, the lowest performing of the local authority areas in Gloucestershire County during this period of time in relation to both domestic spend and overseas spend, with the Cotswolds performing mostly strongly in relation to both of these measures as shown below in **Table A2.10**¹¹⁶.

Table A2.10: Stroud - Staying visits in the Gloucestershire County context

Area	Domestic trips (000's)	Overseas trips (000's)	Domestic spend (millions)	Overseas spend (millions)
Cheltenham	321	53	£59	£23
Cotswold	503	65	£100	£33
Forest of Dean	256	37	£42	£21
Gloucester	294	50	£49	£19
Stroud	218	35	£33	£13
Tewkesbury	266	40	£47	£17

A2.133 Stroud District Council recognises the importance of the Cotswolds brand as a draw for tourists given its international recognition and reputation. As such, considering that it forms part of the Cotswolds AONB, the District aims to strengthen its position within the Cotswolds for tourism marketing purposes so that it remains an integral part of the tourism offer for the wider area. Research suggests the Cotswolds could be considered a destination for older visitors meaning that there is potentially future need to consider whether the area's core markets should be

¹¹⁴ AECOM (2019) *Stroud Sustainable Transport Strategy*

¹¹⁵ Cotswolds Conservation Board (September 2018) *Cotswolds AONB Management Plan 2018-2023*

¹¹⁶ South West Research Company on behalf of Cotswold District Council (October 2019) *The Economic Impact of Gloucestershire's Visitor Economy 2018*

concentrated on this category of visitor or whether there is requirement to adopt a strategy to promote the District to a younger audience¹¹⁷.

A2.134 The updated challenges which town centres in the District face partially reflecting the national trend of the increased importance of e-retail impacts means there are likely to be evolving town centre roles within the District with emerging opportunities for leisure uses and tourism. The Stroud Town Centre Neighbourhood Development Plan 2015 – 2035¹¹⁸ identifies the strong traditional market presence, independent shops, cafes and cultural street life and festivals as current strengths and potential opportunities to be built upon for the town centre. A rise in leisure uses has been discernible at all of the town centres in the District up to the end of 2016 most notably at Dursley, Wotton-under-Edge and Stonehouse¹¹⁹. The potential for future tourism growth in all parish cluster areas of the District is recognised by the Council through the Pre-submission Draft Local Plan¹²⁰. Many of the locations in the District benefit from attractive landscape setting with some providing nearby access on the Cotswolds Way and acting as the gateway to the Cotswolds.

¹¹⁷ Stroud District Council (March 2017) *Community Services And Licensing Committee Information Sheet: Tourism Update*

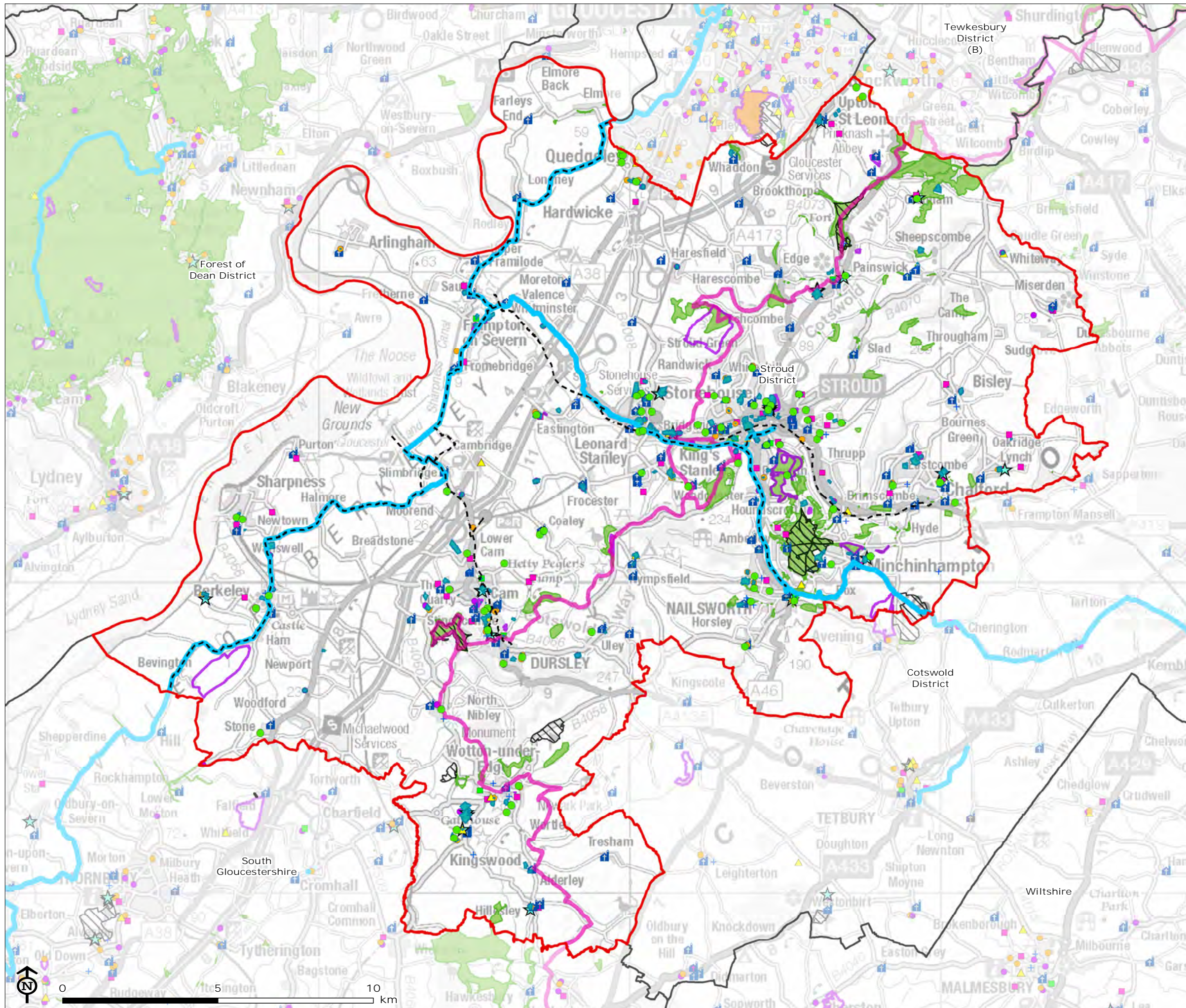
¹¹⁸ Stroud Town Council (October 2016) *Stroud Town Centre Neighbourhood Development Plan 2015 – 2035*

¹¹⁹ Stroud District Council (February 2017) *Environment Committee Agenda Paper: Future of Town Centres Stroud, Nailsworth, Stonehouse, Dursley, Wotton Under Edge*

¹²⁰ Stroud District Council (May 2021) *Stroud Pre-submission Draft Local Plan*

Stroud District Council
Sustainability Appraisal
of Local Plan Review

Figure A2.1: Recreation






- Stroud District
 - Other Local Authority boundary
 - Council play area
 - Protected outdoor playspace
 - National Trail
 - Cycle route
 - NCN link
 - National Cycle Network (NCN)
 - Country Park
 - Open Country and Registered Common Land
- Green space
- Allotments Or Community Growing Spaces
 - Bowling Green
 - + Cemetery
 - ▲ Other Sports Facility
 - Play Space
 - Playing Field
 - Ⓜ Religious Grounds
 - ★ Tennis Court
 - Golf Course
 - Public Park Or Garden





Map Scale @A3: 1:120,000
















**Stroud District Council
Sustainability Appraisal
of Local Plan Review**

Figure A2.2: Landscape Features

-  Stroud District
-  Other Local Authority boundary
-  Area of Outstanding Natural Beauty

- National Character Areas**
-  105: Forest Of Dean And Lower Wye
 -  106: Severn And Avon Vales
 -  107: Cotswolds
 -  118: Bristol, Avon Valleys And Ridges

- Landscape Characterisation**
-  01: Wold Tops
 -  02: Rolling Valleys
 -  03: Secluded Valleys
 -  04: Escarpment
 - 5. Rolling Agricultural Plain
 -  5A: Escarpment foot slopes
 -  5B: Lowland Plain
 -  5C: Frome River Valley
 - 6. Undulating Lowlands
 -  6A: Little Avon Basin
 -  6B: Little Avon Mid-Valley
 -  6C: Wooded Lowlands
 -  6D: Lowland Ridges
 -  07: Severn Vale Hillocks
 -  08: Severn Vale Grazing Marshland
 -  09: Sandstone Ridge
 -  10: Triassic Ridge
 -  11: Wooded Cambrian Ridge
 - 12. Kingswood Vale
 -  12A: Kingswood Vale - North
 -  12B: Kingswood Vale - South

Map Scale @A3: 1:120,000

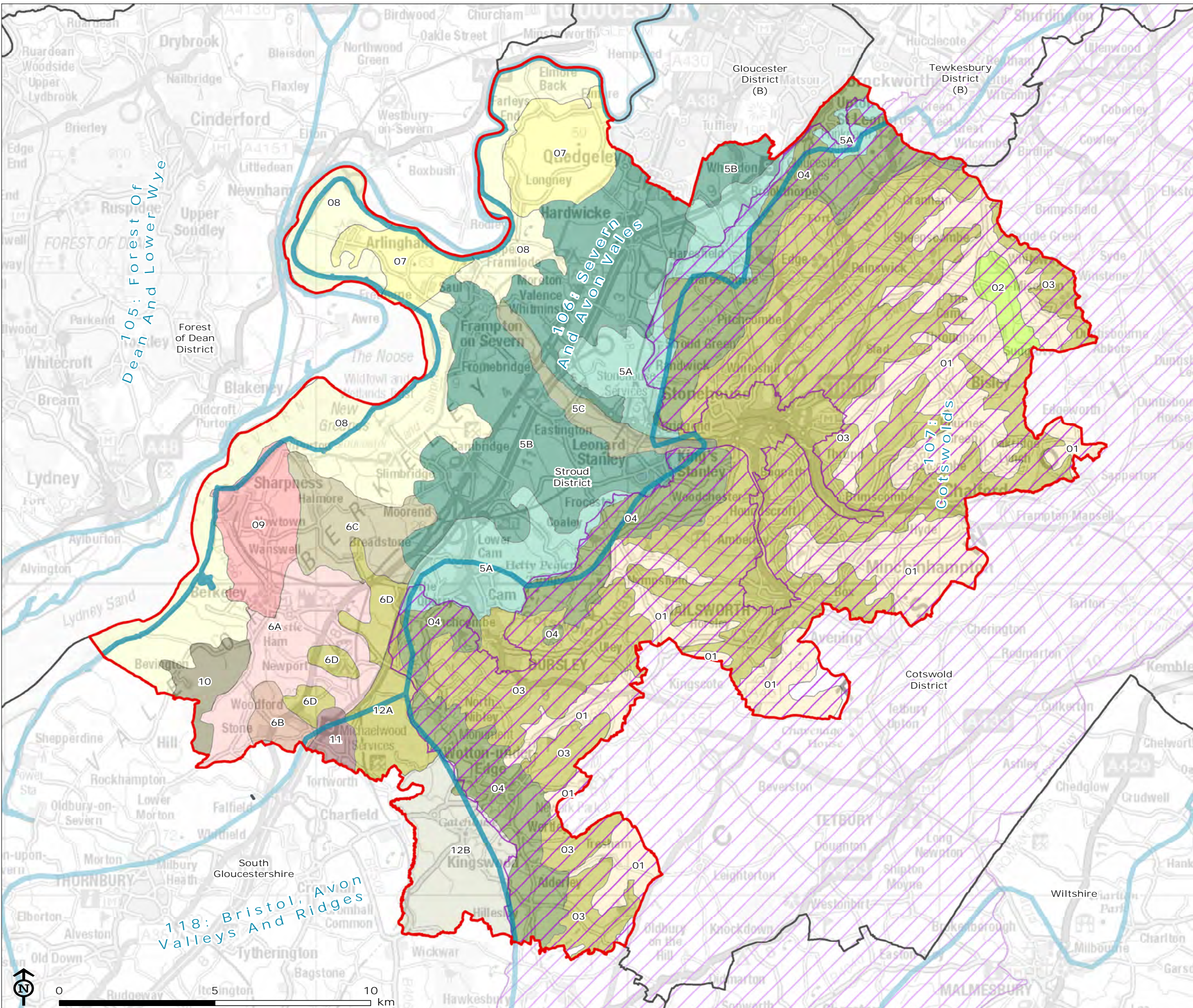
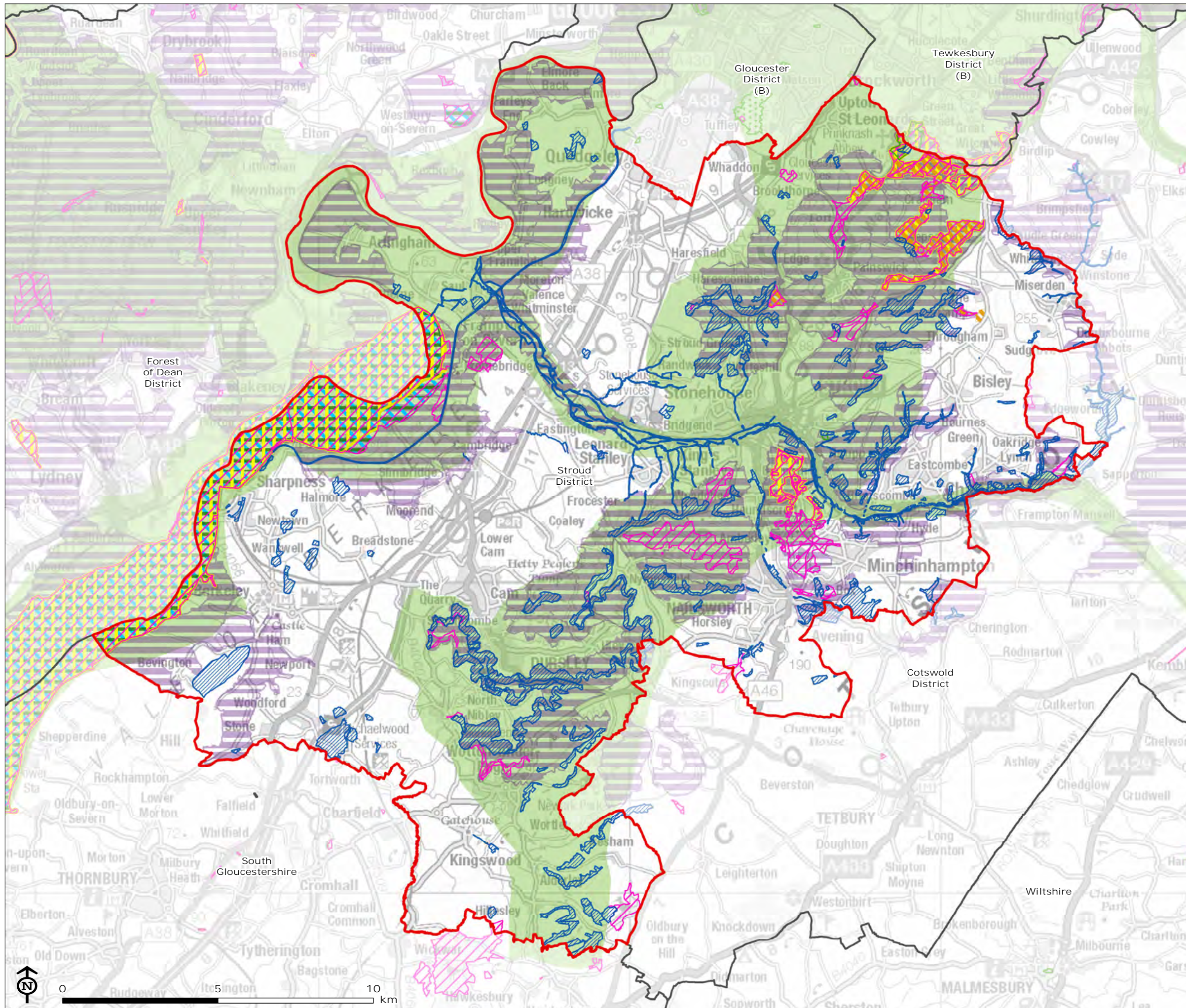


Figure A2.3: Biodiversity Designations



- Stroud District
- Other Local Authority boundary

- International designations**
- Special Area of Conservation
- Ramsar site
- Special Protection Area

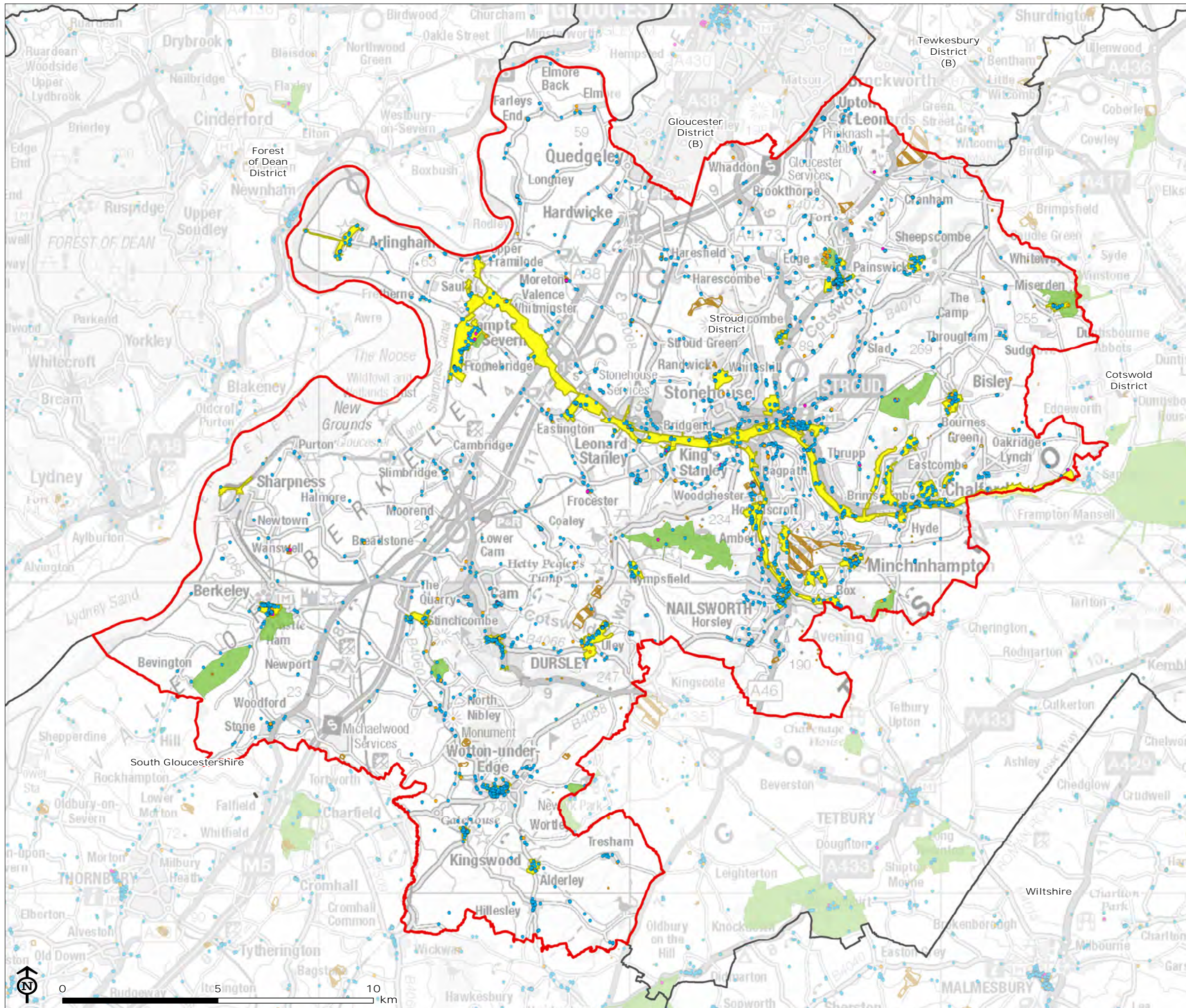
- National designations**
- Sites of Special Scientific Interest
- National Nature Reserve

- Local designations**
- Key Wildlife Sites
- Local Nature Reserve
- Strategic Green Infrastructure Framework area
- Strategic Nature Area

Map Scale @A3: 1:120,000



Figure A2.5: Heritage Assets

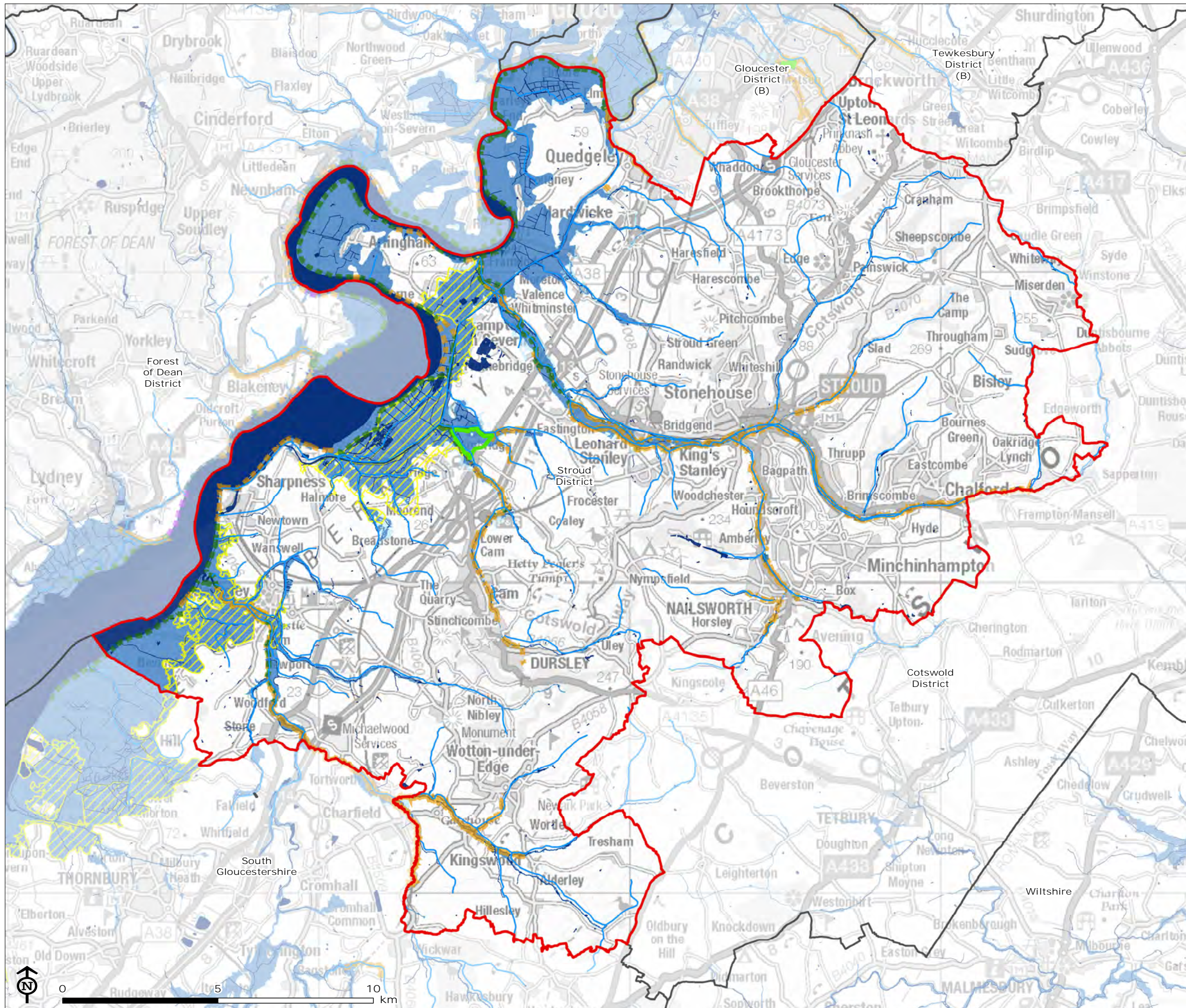


- Stroud District
- Other Local Authority boundary
- Grade I Listed Building
- Grade II* Listed Building
- Grade II Listed Building
- Scheduled Monument
- Conservation Area
- Registered Park & Garden

Map Scale @A3: 1:120,000



Figure A2.7: Hydrology



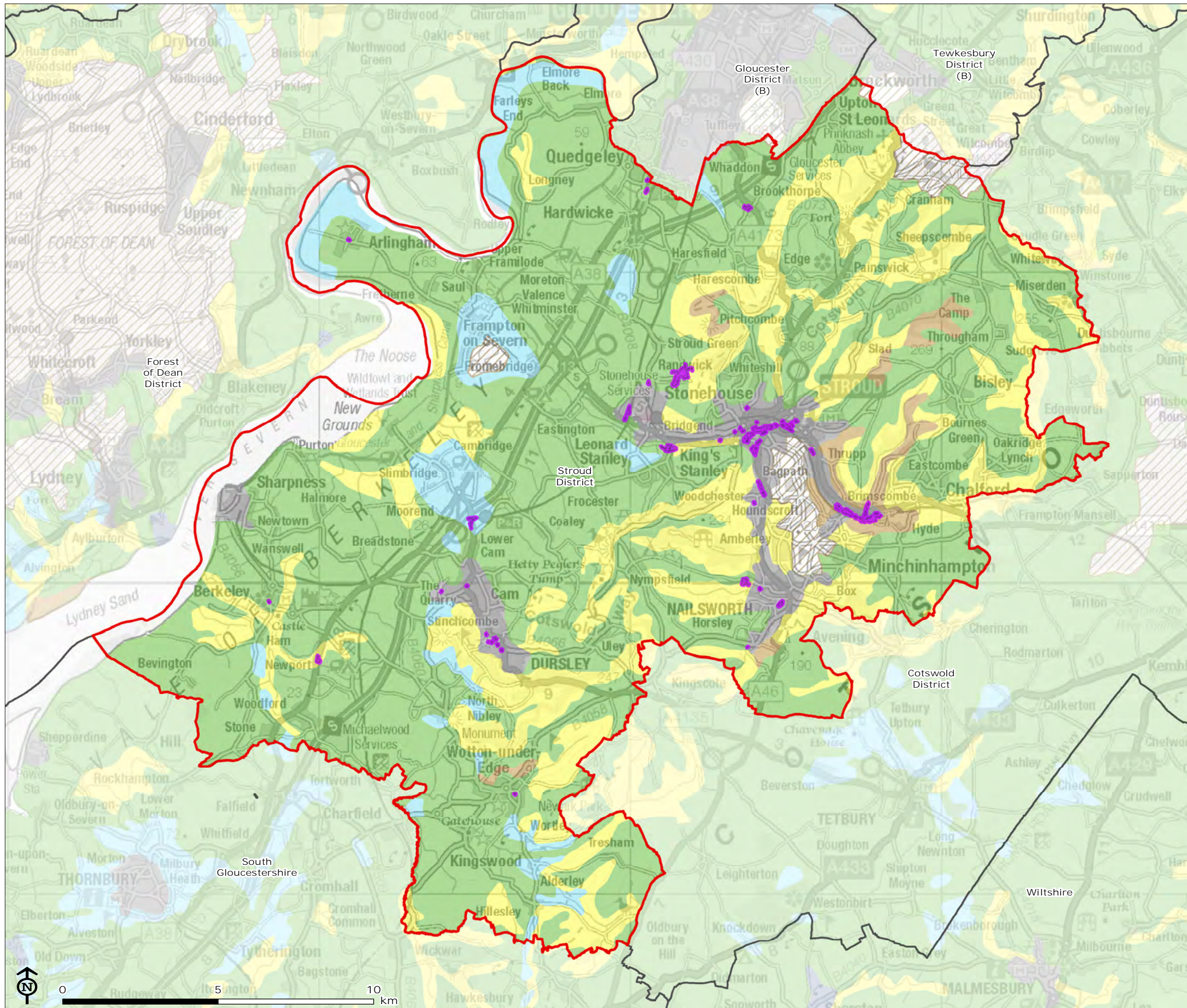
- Stroud District
 - Other Local Authority boundary
 - River
 - Flood Storage Area
 - Surface water
 - Areas benefiting from defences
 - Flood zone 3
 - Flood zone 2
- Surface flood defences**
- Bridge abutment
 - Cliff
 - Embankment
 - Flood gate
 - High ground
 - Wall

Map Scale @A3: 1:120,000



Figure A2.8: Land Classification

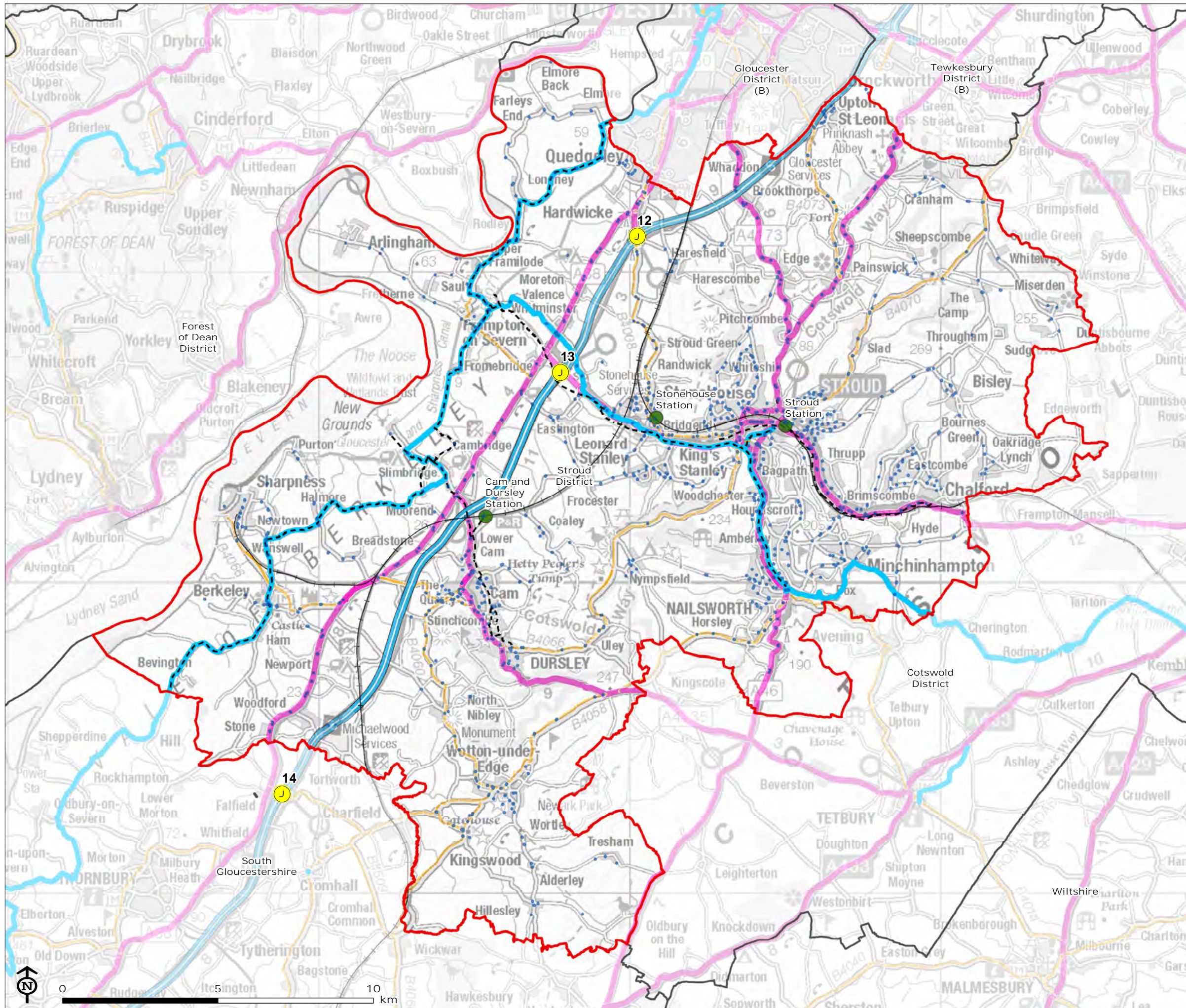
- Stroud District
 - Other Local Authority boundary
 - Brownfield Register site
- Agricultural Landscape Classification**
- Grade 1 (excellent)
 - Grade 2 (very good)
 - Grade 3 (good to moderate)
 - Grade 4 (poor)
 - Grade 5 (very poor)
 - Non Agricultural
 - Urban



Map Scale @A3: 1:120,000



Figure A2.9: Transport Links



- Stroud District
- Other Local Authority boundary
- Bus stop
- Cycle route
- NCN link
- National Cycle Network (NCN)
- Railway Station
- Railway
- Motorway
- A Road
- B Road
- Motorway junction

Map Scale @A3: 1:120,000

