



Stroud District Local Plan Review

Summary of Regulation 20 responses to the Pre-Submission
Draft Plan (Regulation 19 Consultation)

PART 1: Site Allocations

April 2022

Development Services
Stroud District Council
Ebley Mill
Stroud
Gloucestershire
GL5 4UB

The Planning Strategy Team
local.plan@stroud.gov.uk

visit www.stroud.gov.uk/localplanreview



Planning
for our future



Contents

Introduction	1
Part 1:	
Strategic (S), Employment (E) and Local Site Allocations	
The Stroud Valleys	3
PS01 Brimscombe Mill	3
PS02 Brimscombe Port	7
PS05 East of Tobacconist Road, Minchinhampton	12
PS05a Safeguarded land East of Tobacconist Road	54
PS06 The New Lawn, Nailsworth	81
PS10 Cheapside, Stroud	86
PS11 Merrywalks Arches, Stroud	90
PS12 Police Station/Magistrates Court, Stroud	93
STR065 Land at Beeches Green, Stroud	96
The Stonehouse cluster	99
PS16 South of Leonard Stanley Primary School	99
PS42 Land off Dozule Close, Leonard Stanley	102
PS17 Magpies site, Oldends Lane, Stonehouse	105
(S) PS19a Stonehouse North West	110
(S) PS20 Eco Park M5 Junction 13	116
Cam & Dursley	125
(S) PS24 Cam North West (W. of Draycott)	125
(S) PS25 Cam North East Extension (E. of River Cam)	138
PS27 1-25 Long Street, Dursley	150
PS28 Land off Prospect Place, Dursley	153
Gloucester's rural fringe	157
HAR017 Land at Sellars Road, Hardwicke	157
(S) PS30 Hunts Grove Extension	161
(E) PS32 Quedgeley East Extension	170
(E) PS43 Javelin Park	174
(S) G1 South of Hardwicke	179
(S) G2 Land at Whaddon	192
The Berkeley cluster	212
PS33 Northwest of Berkeley	212
BER016/17 Land at Lynch Road, Berkeley	221
(S) PS34 Sharpness Docks	230
PS35 Land at Focus School, Wanswell	251
(S) PS36 Sharpness new settlement	262
(S) PS37 Wisloe new settlement	323
The Severn Vale	349
PS44 Northwest of Whitminster Lane, Frampton-on-Severn	349
PS45 Land west of Upton's Gardens, Whitminster	357
PS46 Land west of School Lane, Whitminster	362
The Wotton cluster	367
PS38 South of Wickwar Road, Kingswood	367
(E) PS47 Land west of Renishaw New Mills	376
The Cotswold cluster	381
PS41 Washwell Fields, Painswick	381



Introduction

The Council submitted the **Stroud District Council Local Plan** for Examination on 25th October 2021.

The Planning Inspectorate provides the 'Procedure Guide for Local Plan Examinations' (AD6 in the Examination Library), in which Regulation 22 sets out a list of prescribed documents which must be submitted as part of the Examination, which includes:

- ✓ *The number of representations made under Regulation 20 (in response to consultation at Regulation 19 stage) and a summary of the main issues raised;*
- ✓ *Copies of all representations made under Regulation 20 (in response to consultation at Regulation 19 stage)*
- ✓ *It is vitally important that representations are submitted complete and in good order. They should be provided in an electronic database enabling the full text of each representation to be accessed easily in both policy and paragraph number order and representor order. The database should also clearly identify those who have made a request to be heard by the Inspector under section 20(6) of the PCPA.*

The Council complied with Regulation 22 and submitted a **Regulation 19 Consultation Statement** and an **electronic database** of full reps (CD5, CD5a, CD5b, CD5c and CD5d in the Examination Library).

The Inspectors wrote to the Council on 28 January 2022 (ID-01 in the Examination Library) and requested, in order to assist them progress the Examination, a summary of the duly made representations in

tabular form and a Council response to the summary of the representations/ groups of representations.

The Council confirmed with the Inspectors that it would produce the above information by site allocation and policy, including a summary of the main issues and the Council's initial response. Key stakeholders would be identified individually as requested and other representors would be grouped together by similar response and theme. A pilot example of a site allocation and a policy summary with an indicative Council response was then approved by the Inspectors.

Summary of representations:

The Council has split the summaries into two parts, **Part 1: Site Allocations** and **Part 2: Local Plan Policies**.

The following tables are self-explanatory and include the site allocation policy or other Local Plan policy reference, the number of representors who responded and how many supported, objected or commented on the policy. The tables present a summary of key stakeholder comments and the Council's initial response, followed by groupings of other representations by main themes (identified by representation no.) and the Council's initial response.

It must be noted that all summaries can only provide an overview of submitted representations and should only be considered a guide to the full representations themselves. In order to fully understand any summary and the Council's response, it is advised to read the full



representation and all additional documents submitted, which are available on the Council's Examination webpage:

<https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/stroud-district-local-plan-review/local-plan-examination/examination-library>

If you have any queries relating to this document, please contact the Programme Officer **Charlotte Glancy**.



Address: C/O Banks Solutions, 80 Lavinia Way, East
Preston, West Sussex BN16 1DD



Tel: 01903 776601

M: +447519 628064



bankssolutionsuk@gmail.com





Site Reference: Local Sites Allocation Policy PS01 Brimscombe Mill			
Number of representations: 18		Support: 12	Object: 3
Stakeholders		Comments	Stroud District Council Response
Support			
The Canal and River Trust (496)	<ul style="list-style-type: none"> Support any new development which will help bring forward the restoration of the Cotswold Canals. 		Comment noted
	Policy wording modifications: None		
Object			
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> The allocation contains part of the River Frome Local Wildlife Site, which is cited for its structural diversity and significant botanical and animal interest, including protected species. 		Comment noted
	<ul style="list-style-type: none"> Potential impacts on the Local Wildlife Site are not accounted for in the site requirements. 		The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.
	<ul style="list-style-type: none"> The river is a core component and corridor for the countywide ecological network requiring highly sensitive development. 		Comment noted
	<ul style="list-style-type: none"> The master planning approach should be informed by a detailed ecological appraisal and GI delivered to Building with Nature standards. 		The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.
	<ul style="list-style-type: none"> Key ecological and biodiversity issues include; waste water, maintenance and restoration of a natural channel structure, creating a substantial buffer of natural habitat between the watercourse and the development, retention of the large 		The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem



Site Reference: Local Sites Allocation Policy PS01 Brimscombe Mill		
	pooled area, minimal outside and street lighting and no lighting directed at the river.	services. Particular issues to address include conserving and enhancing heritage assets, local biodiversity, delivering high quality locally distinctive design and not increasing flood risk either on or off site. A masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner
Policy wording modifications: None		
Comment		
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> The site has been allocated for development for some significant time (Site SA1d in 2015 Local Plan). 	The Council believes the site ownership issues can be overcome and the site is therefore available and deliverable.
	<ul style="list-style-type: none"> The site remains undeliverable because of land ownership and drainage concerns. 	
Policy wording modifications: None		
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> The site has been allocated for development for some significant time (Site SA1d in 2015 Local Plan). 	The Council believes the site ownership issues can be overcome and the site is therefore available and deliverable.
	<ul style="list-style-type: none"> The site remains undeliverable because of land ownership and drainage concerns. 	
Policy wording modifications: None		
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> The site has been allocated for development for some significant time (Site SA1d in 2015 Local Plan). 	The Council believes the site ownership issues can be overcome and the site is therefore available and deliverable.
	<ul style="list-style-type: none"> The site remains undeliverable because of land ownership and drainage concerns. 	
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
358	<ul style="list-style-type: none"> Support brownfield sites 	Comment noted



Site Reference: Local Sites Allocation Policy PS01 Brimscombe Mill		
Strategic growth and development locations		
192	<ul style="list-style-type: none"> Too many houses overall and doubts over affordable housing delivery. 	<p>The Council considers the proposed allocation to be of appropriate scale and size for this Tier 3a settlement. Justification for the role of Brimscombe & Thrupp in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).</p> <p>Outside the AONB and designated rural parishes, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.</p>
Settlement hierarchy and place making		
No comments received		
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
No comments received		
Community facilities		
No comments received		
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
No comments received		
Retail and town centres		



Site Reference: Local Sites Allocation Policy PS01 Brimscombe Mill		
No comments received		
Travel, transport and highways		
No comments received		
Infrastructure		
No comments received		
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
No comments received		
Landscape		
No comments received		
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		





Site Reference: Local Sites Allocation Policy PS02 Brimscombe Port		
Number of representations: 19	Support: 12	Object: 4
Stakeholders	Comments	Stroud District Council Response
Support		
The Canal and River Trust (496)	<ul style="list-style-type: none"> Support any new development which will help bring forward the restoration of the Cotswold Canals. 	Comment noted
Policy wording modifications: None		
Object		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> The allocation contains part of the River Frome Local Wildlife Site, which is cited for its structural diversity and significant botanical and animal interest, including protected species. 	Comment noted
	<ul style="list-style-type: none"> Potential impacts on the Local Wildlife Site are not accounted for in the site requirements. 	The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.
	<ul style="list-style-type: none"> The river is a core component and corridor for the countywide ecological network requiring highly sensitive development. 	Comment noted
	<ul style="list-style-type: none"> The site is also in a high priority area for wetland and woodland habitat creation as part of the Nature Recovery Network (NRN). 	Particular issues to address include conserving and enhancing heritage assets, local biodiversity, delivering high quality locally distinctive design and not increasing flood risk either on or off site. A masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner
	<ul style="list-style-type: none"> The master planning approach should be informed by a detailed ecological appraisal with opportunities for enhancement of ecological features alongside mitigation of adverse impacts. 	
	Policy wording modifications: None	
	<ul style="list-style-type: none"> It is recommended that this allocation is required to achieve the Building with Nature Benchmark or similar standards for GI. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
National Trust (304)	<ul style="list-style-type: none"> Refer to the Stroud Landscape Project initiative to 	On-site specifics; including strategic landscaping to provide accessible open



Site Reference: Local Sites Allocation Policy PS02 Brimscombe Port		
	deliver landscape-scale conservation and connectivity to support nature recovery	space, minimise landscape impacts and safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.
	Policy wording modifications: None	
	<ul style="list-style-type: none"> Additional numbered point to be added to the policy: "Appropriate mitigation measures or replacement green infrastructure to safeguard the AONB from development pressure". 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Comment		
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> The continued allocation of Brimscombe Port for 150 dwellings and canal related tourism development is unsound. 	Comment noted
	<ul style="list-style-type: none"> Significant infrastructure costs in terms of the provision of a new canal link servicing the site and a need to access and acquire third party land. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> No convincing evidence about the overall viability of the proposal. 	The Council's Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> The site is in an active economic use and the long-term aspirations to deliver this site are unrealistic. 	The Council consults with land owners to establish availability and deliverability.
	Policy wording modifications: None	
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> The continued allocation of Brimscombe Port for 150 dwellings and canal related tourism development is unsound. 	Comment noted
	<ul style="list-style-type: none"> Significant infrastructure costs in terms of the provision of a new canal link servicing the site and a need to access and acquire third party land. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> No convincing evidence about the overall viability of the proposal. 	The Council's Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.



Site Reference: Local Sites Allocation Policy PS02 Brimscombe Port		
	<ul style="list-style-type: none"> The site is in an active economic use and the long-term aspirations to deliver this site are unrealistic. 	The Council consults with land owners to establish availability and deliverability.
Policy wording modifications: None		
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> The continued allocation of Brimscombe Port for 150 dwellings and canal related tourism development is unsound. 	Comment noted
	<ul style="list-style-type: none"> Significant infrastructure costs in terms of the provision of a new canal link servicing the site and a need to access and acquire third party land. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> No convincing evidence about the overall viability of the proposal. 	The Council's Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> The site is in an active economic use and the long-term aspirations to deliver this site are unrealistic. 	The Council consults with land owners to establish availability and deliverability.
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
358	<ul style="list-style-type: none"> Support brownfield sites 	Comment noted
Strategic growth and development locations		
214	<ul style="list-style-type: none"> Long standing allocation. 	Comment noted
214	<ul style="list-style-type: none"> Essential that development links up with the National Canal Network and is not an isolated project. 	Comment noted
365, 788	<ul style="list-style-type: none"> Support as a critical part of canal linked regeneration. 	Comment noted



Site Reference: Local Sites Allocation Policy PS02 Brimscombe Port		
192	<ul style="list-style-type: none"> Too many houses overall and doubts over affordable housing delivery. 	<p>The Council considers the proposed allocation to be of appropriate scale and size for this Tier 3a settlement. Justification for the role of Brimscombe & Thrupp in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).</p> <p>Outside the AONB and designated rural parishes, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.</p>
Settlement hierarchy and place making		
No comments received		
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
No comments received		
Community facilities		
365	<ul style="list-style-type: none"> Opportunity for improving local facilities within walking and easy cycling distance of Brimscombe and Thrupp. 	Comment noted
Policy wording modifications: None		
365	<ul style="list-style-type: none"> Include a requirement for a local small supermarket. 	Land at Brimscombe Port is allocated for a development comprising 150 dwellings, canal related tourism development and employment uses and associated community and open space uses, together with enabling infrastructure.



Site Reference: Local Sites Allocation Policy PS02 Brimscombe Port		
Economy and Infrastructure		
Employment		
No comments received		
Retail and town centres		
No comments received		
Travel, transport and highways		
365	<ul style="list-style-type: none"> Will require highway improvements to facilitate the proposed strategic cycle route along the A419 and improve the cycling and pedestrian environment. 	Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.
Infrastructure		
No comments received		
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
No comments received		
Landscape		
No comments received		
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
214	<ul style="list-style-type: none"> Key issue is deliverability with particular regard to planning gain. 	Comment noted
788	<ul style="list-style-type: none"> Requires a specific timeline with a commitment to compulsory action to ensure delivery. 	Comment noted





Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton			
Number of representations: 100		Support: 6	Object: 80
Stakeholders		Comments	Stroud District Council Response
Support			
Archstone (239) Site promoter	<ul style="list-style-type: none"> The proposed allocation of land south of Farm Close (east of Tobacconist Road PS05) for up to 80 dwellings (including 30% affordable homes) is necessary for the Local Plan to be sound. It is required to respond positively and effectively to identified issues and needs at Minchinhampton. 	Comment noted	
	<ul style="list-style-type: none"> Identified issues and needs are placing increasing pressure on the community’s diversity and vitality, including: <ul style="list-style-type: none"> Ageing population Socio-economic exclusion Acute housing unaffordability Reducing household size Low historic housing growth, in proportion to the settlement’s size and functionality 	Comment noted	
	<ul style="list-style-type: none"> Minchinhampton is a substantial Tier 2 settlement, a sustainable community with a strong local retail role and a very good level of local services and facilities (reference to SDC Settlement and Role and Function Update 2018). 	Comment noted	
	<ul style="list-style-type: none"> Minchinhampton NDP recognises the need for affordable housing and a mix of market dwellings. The 2016 Housing Needs Study identified 24 households with a need for affordable homes at that time. The NDP did not allocate or identify any sites to seek to address the need; it does, however, recognise the Local Plan process as a means of sites coming forward to meet community needs. 	Comment noted	
	<ul style="list-style-type: none"> Housing supply alternatives: Minchinhampton has 	Comment noted	



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
	<p>been reliant on windfall and infill sites throughout the current Local Plan period. Smaller sites cannot typically provide for a good range of dwellings or require affordable housing. There have been proposals to redevelop former mill sites in the industrial valley bottoms. These sites are somewhat remote from Minchinhampton village and are also unlikely to deliver affordable housing due to viability.</p>	
	<ul style="list-style-type: none"> • A 2010 “Planning for Real” exercise, organised by the Parish Council, identified this location as the preferred place to accommodate growth at Minchinhampton. 	Comment noted
	<ul style="list-style-type: none"> • Landscape sensitivity: discussions with the AONB Board (CCB) established that the land east of Tobacconist Road is the most suitable (least sensitive) location to direct growth for Minchinhampton. This is confirmed by the Stroud Landscape Sensitivity Report (land parcel reference M06) (2016). 	Comment noted
	<ul style="list-style-type: none"> • The land east of Tobacconist Road has been proposed as a potential allocation in each previous stage of Local Plan preparation (since 2017). 	Comment noted
	<ul style="list-style-type: none"> • Through the Local Plan preparation process: <ul style="list-style-type: none"> ○ The proposed allocation has been reduced from 100 to 80 dwellings; ○ The extent of the site has been substantially reduced, to focus development on the northern part of the site, which is adjacent to the existing settlement edge and least sensitive in landscape/AONB terms. 	Comment noted
	<ul style="list-style-type: none"> • Access and traffic: the development can be served by a vehicular access via the Bulwarks and Farm Close. This will be instead of the access onto Tobacconist Road, where traffic from the development travelling 	Comment noted



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
	towards Cirencester would have passed through the High Street. An access via the Bulwarks has the benefit of linking to the Cirencester Road beyond the High Street. A pedestrian/cycle only link can still be maintained to Tobacconist Road for convenient access to facilities.	
	<ul style="list-style-type: none"> Heritage: the reduced development area also removes any risk of a significant adverse impact on the Bulwarks SAM. 	Comment noted
	<ul style="list-style-type: none"> Appropriate mitigation will be provided to minimise any potential impact from additional visitors to the Rodborough Common SAC. 	Comment noted
	<ul style="list-style-type: none"> The proposed allocation is justified because it is necessary and has been demonstrated to be the most appropriate location to accommodate the much-needed new homes for Minchinhampton. 	Comment noted
	<ul style="list-style-type: none"> Accompanying technical information to inform and support the proposed allocation: <ul style="list-style-type: none"> Concept Plan Environmental Appraisal Additional Heritage Technical Note Additional Landscape Technical Note 	Comment noted
Policy wording modifications: None		
The Cotswolds Conservation Board (688)	<ul style="list-style-type: none"> We consider that Stroud District Council has provided sufficient evidence and proposed sufficient mitigation for the allocation to be legally compliant and sound. We therefore withdraw our previous objection and, in effect, support the allocation. 	Comment noted
	<ul style="list-style-type: none"> Reference to the CCB's Landscape-led Development Position Statement (adopted March 2021), which indicates that PS05 does potentially constitute 'major development' in the AONB. Reference to case law, which establishes the exceptional circumstances 	Comment noted



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
	<p>under which major development may be permissible in AONB.</p> <ul style="list-style-type: none"> Evidence demonstrates that there is a level of housing need, specific to the settlement of Minchinhampton, to justify a development of this scale (taking into account the % of affordable housing required by Stroud District Council) in this location 	Comment noted
	<ul style="list-style-type: none"> This land parcel has a relatively low landscape sensitivity compared to other land parcels adjacent to Minchinhampton or adjacent to other settlements within the AONB. 	Comment noted
	<ul style="list-style-type: none"> Some remaining concerns over potential adverse impacts, particularly with regards to the adjacent scheduled monument ('cultural heritage'). Reassured, however, that the proposed mitigation measures should help to minimise any such impacts. 	Comment noted
Policy wording modifications: None		
DK Planning & Development Ltd for the owner of Tobacconist Farm (275) (Site promoter for PS05a)	<ul style="list-style-type: none"> Instructed by the owner of Tobacconist Farm, Tobacconist Road, Minchinhampton to promote the immediate allocation of all or part of site PS05a for residential development, either as part of a wider allocation including all or part of the adjacent site PS05 or separate to and possibly in lieu of the adjacent site. Site PS05a had initially been progressed by a site promoter as part of a wider potential site allocation including site PS05. The agreement between the site promoter and the owner of Tobacconist Farm expired in December 2020. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton's potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>The Council considers the proposed Local Site Allocation PS05 to be of appropriate scale and size for this Tier 2 AONB settlement. Justification for the role of Minchinhampton in the development strategy and the allocation of site PS05 to meet identified local needs is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
	<ul style="list-style-type: none"> Reference to 'Development in the Cotswolds Area of Outstanding Natural Beauty – Policy Assessment of Draft Allocated Sites' (May 2021), part of the Local Plan Review evidence base, which concludes that PS05 would not constitute major development in the context of paragraph 172 of the NPPF. <ul style="list-style-type: none"> Many of the findings relating to PS05 (Appendix A) are similarly applicable to PS05a. 	Comment noted
	<ul style="list-style-type: none"> Landscape sensitivity: Reference to Stroud Landscape Sensitivity Report (2016). PS05 and PS05a are within land parcel reference M06. Medium sensitivity to housing uses. Development could lead to an improvement to the settlement edge, without impinging on open arable farmland or detracting from the character of Minchinhampton, particularly with a supplemented tree buffer. 	Comment noted
	<ul style="list-style-type: none"> Heritage: The impact on the setting of heritage assets, including the Town's Conservation Area and the Bulwark's Scheduled Ancient Monument can be positively managed. 	Comment noted
	<ul style="list-style-type: none"> Access: PS05a enables an appropriate highway access onto Tobacconist Road, providing both vehicle and pedestrian access into the centre of Minchinhampton; and linking southwards towards Tetbury, southwest to Nailsworth, north to Stroud or east to Cirencester. 	Comment noted
	Policy wording modifications:	
	<ul style="list-style-type: none"> The allocation of all or part of site PS05a for residential development either as part of a wider allocation including all or part of the adjacent site PS05 or separate to and possibly in lieu of the adjacent site. 	All suggested policy modifications will be considered by the Inspectors at the EIP.
Object		



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
Aston Down Action Group (20)	<ul style="list-style-type: none"> The allocation is outside of the Settlement Development Limit. 	The Council considers Local Site Allocation PS05 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
	<ul style="list-style-type: none"> NPPF defines Major Development as 10 or more houses. PS05 is contrary to national policy as it exceeds 9 houses and it is not demonstrated to be in the National Interest to develop this site or that these houses cannot be located elsewhere outside of the AONB. 	<p>The Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) concludes that PS05 would not constitute major development in the context of paragraph 172 of the NPPF and is limited to meeting local housing need, arising solely from within the AONB.</p> <p>The Council considers the proposed Local Site Allocation PS05 to be of appropriate scale and size for this Tier 2 AONB settlement. Justification for the role of Minchinhampton in the development strategy and the allocation of site PS05 to meet identified local needs, arising from within the AONB, is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p>
Policy wording modifications: None		
Aston Down Action Group (333)	<ul style="list-style-type: none"> The allocation is not strategic but for identified local need. NPPF Para 77 Rural Housing requires authorities bring forward exception sites to support rural housing needs. This allocation should be reassessed to show its purpose as an exception site and how it is a "limited development" in the context of NPPF Para 172. <ul style="list-style-type: none"> Scale: the proposed allocation PS05 is not "limited" in "scale and extent", as required by NPPF Para 77 Rural Housing; and it is not a "small site" (fewer than 10 houses), as defined by Stroud District Residential Commitments 01/04/2020. 	<p>PS05 is a proposed Local Site Allocation, not an exception site.</p> <p>The Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) concludes that PS05 would not constitute major development in the context of paragraph 172 of the NPPF and is limited to meeting local housing need, arising solely from within the AONB.</p> <p>Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 4 or more dwellings within the Cotswolds AONB. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.</p>
	<ul style="list-style-type: none"> Minchinhampton parish housing needs assessment 	Topic Paper: Housing needs and supply October 2021 (EB8) evidences



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
	<p>2016, identifies a need for 24 affordable homes and 98 market homes. Some of that need has already been supplied, but the evidence base does not adequately acknowledge this.</p>	<p>Council’s approach to identifying and assessing housing needs, calculating the minimum residual housing requirement for the whole of Stroud District, and delivery of the different component elements of housing land supply, taking into account existing commitments with planning permission and a small sites Windfall allowance.</p>
	<ul style="list-style-type: none"> The Stroud District 5 Year Housing Land Supply Oct 2020 (Appendix 9-10; pages13-16) identifies that between 2020-2025 there will be delivery of 147 new dwellings within the Parish of Minchinhampton. This will provide an adequate number of dwellings for the Parish for the next 5 years without the need to bring forward an exception site. There is no evidence to support further housing need. 	
	<ul style="list-style-type: none"> No justification for unnecessary development in the Cotswolds AONB. 	<p>The Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) evidences the Council’s strategic approach to allocating sites at Tier 2 settlements within the AONB to meet identified housing needs arising solely from within the AONB, in accordance with National Planning Practice Guidance and the Cotswolds Conservation Board’s AONB Management Plan.</p>
<p>Policy wording modifications: None</p>		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> Not sound or legally compliant, due to unmitigated adverse recreational impacts on the Cotswold Commons and Beechwoods SAC. Not compliant with the Conservation of Habitats and Species Regulations 2017, Strategic Policy S06 or NPPF 174a &b. Evidence not presented to demonstrate how increased recreational pressure from the development will be avoided. 	<p>The site is located within the Rodborough Common SAC and Cotswold Beechwoods SAC core catchment zones. Development proposals within these core catchment zones will be required to contribute to mitigation measures, in accordance with the agreed SAC Avoidance and Mitigation Strategy, in order to avoid an adverse effect on the integrity of the SAC associated with increased recreational activity over the plan period.</p>
	<ul style="list-style-type: none"> Provision of new strategic GI in the form of SANGs will be necessary to avoid increased recreational impacts on the Severn Estuary SPA, SAC and RAMSAR sites. Ideally this should be delivered strategically and in combination with other developments affecting the SAC. 	<p>The site is located within the Severn Estuary SAC, SPA and Ramsar core catchment zone. Development proposals within this core catchment zone will be required to contribute to mitigation measures, in accordance with the agreed SAC Avoidance and Mitigation Strategy, in order to avoid an adverse effect on the integrity of the SAC associated with increased recreational activity over the plan period.</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
Policy wording modifications: None		
Minchinhampton Parish Council (504)	<ul style="list-style-type: none"> Minchinhampton Parish considers PS05 to be far too big and poorly proposed. On balance, the negative implications of this proposal far outweigh potential positive advantages. 	<p>The Council considers the proposed Local Site Allocation PS05 to be of appropriate scale and size for this Tier 2 AONB settlement. Justification for the role of Minchinhampton in the development strategy and the allocation of site PS05 to meet identified local needs and to help sustain long-term settlement vitality is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p>
	<ul style="list-style-type: none"> Housing need: housing delivery within Minchinhampton Parish has consistently met a requirement over at least the last 20 years in excess of 8 dwellings a year. No allocation is needed to accommodate realistic growth. (Reference to historic growth and schemes such as the Tynings, Old Common and ongoing Wimberley Mills). 	<p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences Council’s approach to identifying and assessing housing needs, calculating the minimum residual housing requirement for the whole of Stroud District, and delivery of the different component elements of housing land supply, taking into account existing commitments with planning permission and a small sites Windfall allowance.</p> <p>The Stroud District Settlement Role and Function Study Update 2018 (May 2019) (EB72) establishes that the Minchinhampton settlement (as opposed to the wider parish) has experienced low historic housing growth. The Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) justifies the allocation of PS05, setting out local evidence of affordable housing needs which cannot be met in full with any certainty other than from an allocation in the Local Plan.</p>
	<ul style="list-style-type: none"> Housing need and market / affordable housing mix: market housing is not required in order to enable sufficient affordable dwellings for the Parish. What is needed is subsidised land for social housing, met through exceptions sites policies. Restricted availability of housing land within the Parish and inflated land values inhibit truly affordable projects. 	<p>Core Policy CP9 Affordable Housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 4 or more dwellings in Minchinhampton parish. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.</p> <p>The Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) justifies the allocation of PS05 for up to 80 homes, including 30% (up to 24) affordable homes, setting out local evidence of</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton	
	<p>affordable housing needs which cannot be met in full with any certainty other than from an allocation in the Local Plan. Moreover, it identifies the need to focus limited development at Minchinhampton in order to help maintain the settlement’s diversity and vitality.</p>
<ul style="list-style-type: none"> Growth strategy / scale: Growth in the Parish should be organic, pragmatic, and not forced. Single growth point of 80 units will distort and acerbate absorption problems. PS05 cannot be delivered in an economic, effective, and efficient way without significant disruption and adverse impact to many households. Collateral benefit from CIL or negotiated community provision is to be welcomed, but not at any price. 	<p>The Council considers the proposed Local Site Allocation PS05 to be of appropriate scale and size for this Tier 2 AONB settlement. Justification for the role of Minchinhampton in the development strategy and the allocation of site PS05 to meet identified local needs is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p>
<ul style="list-style-type: none"> Growth strategy / location: Should be brownfield before greenfield allocations. Why has the site at Dark Mills (lapsed planning permission for 55 sheltered housing units) been overlooked by the Local Plan review? 	<p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including consideration of reasonable alternatives and a primary focus on potential sites lying on the periphery of Tier 1-3 settlements, in accordance with the development strategy.</p> <p>The Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) evidences the Council’s approach to allocating sites at Tier 2 settlements within the AONB to meet identified housing needs arising solely from within the AONB, in accordance with National Planning Practice Guidance and the Cotswolds Conservation Board’s AONB Management Plan. Land at Dark Mills, Brimscombe, is remote from the Minchinhampton settlement and lies outside the AONB.</p> <p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences Council’s approach to identifying and assessing housing needs, calculating the minimum residual housing requirement for the whole of Stroud District, and delivery of the different component elements of housing land supply, taking into account existing commitments with planning permission and a small sites Windfall allowance. Land at Dark Mills, Brimscombe, is an existing commitment for 36 units, recorded in the Stroud District Housing Land</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton	
	<p>Availability Report 2021 (EB12) 2020 (EB13) and accounted for in Section 2.5 Housing, Table 2 Calculating our residual housing requirement to 2040, which sets out the component elements of housing supply against objectively assessed housing needs and a minimum residual housing requirement of 8,005 dwellings.</p>
<ul style="list-style-type: none"> Site location: Development of the town itself is restricted to the north and west (protected landscapes) and south (geological constraints) and can theoretically only therefore go east. But allocation of PS05 is inappropriate: AONB issues, access difficulties, serious intrusion into open countryside. Development pressure cannot be entertained without consequent damage to nationally important landscapes, protected by statute and within institutional protection. 	<p>The Council considers Local Site Allocation PS05 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection, including landscape issues.</p> <p>On-site specifics, including site access, layout and strategic landscaping to provide accessible open space, minimise landscape impacts and safeguard and enhance local biodiversity to be addressed through masterplanning and at planning application stage.</p>
<ul style="list-style-type: none"> Access: the site cannot be accessed without severe complication. Would require at least 160 additional vehicles (600+ daily journeys) to pass through the Glebe estate: narrow roads; hazardous to children playing; would require parked vehicles to be off-roaded; detrimental to emergency vehicle access. 	<p>On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.</p>
<ul style="list-style-type: none"> Services and facilities: 80 additional homes will offer only marginal benefit to the viability of what remains, and will add to school pressure. The Town itself cannot deliver everything needed for convenient existence. 	<p>Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p>
<ul style="list-style-type: none"> Transport: No further development should be entertained until ongoing work on a Parish-wide speed and parking review is complete, and its conclusion implemented. Car-reliant rural area. Inadequate bus service. 	<p>The Council considers the proposed Local Site Allocation PS05 to be of appropriate scale and size for this Tier 2 AONB settlement. Justification for the role of Minchinhampton in the development strategy and the allocation of site PS05, in part to help address pressing demographic factors in order to ensure the long term diversity, vitality and functionality of the settlement, is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) the Council’s Policy Assessment of Draft Allocated Sites in the</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton	
	<p>Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p> <p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p> <p>Ahead of the EIP, the Council is updating its Highways and its IDP/Infrastructure evidence base and documentation. This will be published in due course.</p>
<ul style="list-style-type: none"> Site / location: The site’s value as back-up winter grazing (in terms of commons management and maintenance) has been overlooked. 	<p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p>
<ul style="list-style-type: none"> Scale: The reduction in numbers from 100 to 80 dwellings is easily reversed tokenism. Risk of intensification (up to 150 units), by omission of generous public open space provision. 	<p>The provision of landscaped open space is a necessary and justified requirement, supported through delivery policy DHC7 and identified in the policy wording for Local Site Allocation PS05 as a particular issue to address.</p> <p>On-site specifics, including layout and strategic landscaping to provide accessible open space, minimise landscape impacts, incorporate the existing PROW and safeguard and enhance local biodiversity, will be addressed at the masterplan/ planning application stage.</p>
<ul style="list-style-type: none"> Unevidenced: The necessary ecological, archaeological and highways studies have not been done. It is vital that any development proposal in the Parish, given all its constraints, be robustly justified from the start to deter further speculative proposals. None of that has been done. 	<p>Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>On-site specifics will be addressed at the masterplan / planning application stage, including site access and highway safety (to be agreed with Gloucestershire Highways), as well as layout and landscaping to minimise landscape impacts, avoid and mitigate impacts on the Bulwarks SAM, conserve and enhance heritage assets and safeguard and enhance local</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton	
	biodiversity.
<ul style="list-style-type: none"> • The site was not identified as development land within the Minchinhampton Neighbourhood Development Plan. The MNDP is a formally adopted document and is material to any planning consideration. The Local Plan Review has failed to recognise its value and expectations and is therefore fundamentally flawed as far as this Parish is concerned. 	<p>Topic Paper: Neighbourhood Planning October 2021 (EB5) explains the relationship between current adopted NDPs and the emerging Local Plan. Stroud District Council has assessed all made and emerging plans for any potential Strategic Policy conflict, including Local Site Allocations, and considers there to be no conflict between the proposed allocation of PS05 and the policies in the Minchinhampton NDP. Development of PS05 will be required to address relevant NDP policies through masterplanning and at planning application stage.</p>
<ul style="list-style-type: none"> • Mitigation: If the proposal (PS05) remains after the review, including representation to the Inspector at EIP, then the Parish Council would ask that the following is recognised and incorporated: <ul style="list-style-type: none"> ○ The establishment of significant wildlife corridors and enhanced PRoW. Tree planting is a parish priority. This can over time soften landscape impact, and aid mental health and wellbeing. ○ Any development must be fully compliant with the Minchinhampton Parish NDP. ○ The Council is actively seeking additional allotment land. ○ The Council is looking to enhance recreational opportunity. ○ The Council is mindful of wider NDP expectations, which will require significant investment to deliver. ○ Dark skies: any new development should be conditioned to specifically exclude external floodlighting after say 11.00pm, and limit fenestration in proposals. 	<p>Comment noted</p>
<p>Policy wording modifications: None</p>	



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
Rodborough parish Council (686)	<ul style="list-style-type: none"> Minchinhampton is not in itself a sustainable settlement in terms of providing employment, secondary education, regular public transport or shopping opportunities. Additional traffic will inevitably be generated (directly contrary to NPPF Para. 103), exacerbating existing traffic congestion in the single-track lanes that lead off the Commons and descend into Rodborough. 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>Justification for the role of Minchinhampton in the development strategy and the allocation of site PS05 is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4). The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p> <p>Ahead of the EIP, the Council is updating its Highways and IDP/Infrastructure evidence base and documentation. This will be published in due course.</p>
	<ul style="list-style-type: none"> Constrained roads and lanes across and off the Commons are not conducive to Active Travel (contrary to NPPF Para. 103). 	
	<ul style="list-style-type: none"> Severe concerns about adverse recreational impact on Rodborough Common SSSI / SAC arising from the proposed housing. No mitigation measures against disproportionate over-use have so far proved either feasible or effective. 	<p>The site is located within the Rodborough Common SAC core catchment zone. Development proposals within this core catchment zone will be required to contribute to mitigation measures, in accordance with the agreed SAC Avoidance and Mitigation Strategy, in order to avoid an adverse effect on the integrity of the SAC associated with increased recreational activity over the plan period.</p> <p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p>
	Policy wording modifications: None	
CPRE Gloucestershire (847)	<ul style="list-style-type: none"> CPRE objects strongly to the inclusion of sites PS05 and PS05a. This site contravenes the following policies in the revised Local Plan: ES7, SO6, DCP1, CP2, HC1, DHC5, DHC6, CP14, ES3, ES6, ES10 and DES2. CPRE urges the inspector to remove these sites 	<p>The Council considers Local Site Allocation PS05 suitable for development and of appropriate scale and size for this Tier 2 AONB settlement. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape, biodiversity and historic</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
	from the Plan.	environment issues, sustainability, accessibility and local housing needs.
	<ul style="list-style-type: none"> Housing need: CPRE disputes the housing need assertion from Stroud District Council. 2016 Housing Needs Survey from GRCC, commissioned by the Parish Council to support NDP preparation, identified need for 24 affordable houses. Minchinhampton Parish has grown by just over 8 houses per annum historically, suggesting that there is plenty of scope to achieve the 24 affordable target within the next few years, without any input from this development. 	<p>The Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) justifies the allocation of PS05 for up to 80 homes, including 30% (up to 24) affordable homes, setting out local evidence of affordable housing needs which cannot be met in full with any certainty other than from an allocation in the Local Plan.</p> <p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.</p>
	<ul style="list-style-type: none"> Growth strategy / scale: the allocation is contrary to NDP, which expressed the community wish that 24 affordable homes should be dispersed in small groups of 5 or 6 rather than in a large development. 	<p>Topic Paper: Neighbourhood Planning October 2021 (EB5) explains the relationship between current adopted NDPs and the emerging Local Plan. Stroud District Council has assessed all made and emerging plans for any potential Strategic Policy conflict, including Local Site Allocations, and considers there to be no conflict between the proposed allocation of PS05 and the policies in the Minchinhampton NDP. Development of PS05 will be required to address relevant NDP policies through masterplanning and at planning application stage.</p> <p>The Council considers the proposed allocation to be of appropriate scale and size to meet the local housing needs of this Tier 2 AONB settlement. Justification for the role of Minchinhampton in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p>
	<ul style="list-style-type: none"> Market housing: there is no legal argument for pressuring the AONB to provide market housing. Reference to NPPF (paragraphs 171 and 172) and the Cotswold Conservation Board management guidelines. 	<p>The Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) evidences the Council's approach to allocating sites at Tier 2 settlements within the AONB to meet identified housing needs arising solely from within the AONB, in accordance with National Planning Practice Guidance and the Cotswolds Conservation Board AONB Management</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton	
<ul style="list-style-type: none"> Sufficient market housing for the Parish can be delivered through existing commitments (Wimberley Mills and Butt Street) and by utilising brownfield land at Dark Mills. 	<p>Plan.</p> <p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences Council’s approach to identifying and assessing housing needs and calculating the minimum residual (whole-District) housing requirement for the Plan period, taking into account existing commitments with planning permission and a small sites Windfall allowance. Land at Dark Mills, Brimscombe, is an existing commitment for 36 units (remote from the settlement and lying outside the AONB), recorded in the Stroud District Housing Land Availability Report 2021 (EB12) and 2020 (EB13). The Topic Paper (EB8) provides further detail on the delivery of the different component elements of housing land supply and on how the Local Plan addresses specific housing needs, including both affordable housing and market housing.</p>
<ul style="list-style-type: none"> A greenfield site, outside settlement development limits; development of this site (and identification of PS05a) may act as precedent for increased greenfield development on this side of town. 	<p>The Council considers Local Site Allocation PS05 suitable for development to meet the local housing needs of this Tier 2 AONB settlement for the Plan period, in conjunction with modest infill development inside the SDL and (exceptionally) adjacent to it. Paragraph 3.1.10 explains that the Council has identified site PS05a as suitable for safeguarding to meet Minchinhampton’s potential future needs, should additional greenfield land be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape impacts and comparative assessment against reasonable alternative sites.</p> <p>The development strategy approach of “managed growth” within and adjoining settlement development limits is explained in Section 2.4 Our towns and villages and supported by Core Policies CP2, CP3 and CP15 and Delivery Policy DHC1.</p>
<ul style="list-style-type: none"> Access: The suggested access for PS05 is not deliverable; access through the housing estate to the north is impossible. Alternative access is not possible: 	<p>On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton	
	<p>narrow lanes or third party land ownership. The suggested pedestrian access is undeliverable: the route is very narrow and existing rights of access by car will endanger cyclists, horse riders and pedestrians.</p>
<ul style="list-style-type: none"> Impact on AONB, Minchinhampton Common SSSI and Rodborough Common SAC: Both commons are home to rare plant and animal species, and are grazed for 6 months of the year by free-ranging cattle with unimpeded access to the road network. Increase in vehicular and foot traffic would harm a delicately balanced ecosystem and landscape views, contrary to NPPF paragraph 175(b). 	<p>Topic Paper – Transport October 2021 (EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices and addressing air quality. The Sustainability Appraisal includes assessment of all sites and reasonable alternatives against SA 10: To ensure that air quality continues to improve based on sustainable access to employment and key services and facilities, SA Report Appendix 3 - 9 (CD3b).</p> <p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p> <p>The site is located within the Rodborough Common SAC core catchment zone. Development proposals within this core catchment zone will be required to contribute to mitigation measures, in accordance with the agreed SAC Avoidance and Mitigation Strategy, in order to avoid an adverse effect on the integrity of the SAC associated with increased recreational activity over the plan period</p>
<ul style="list-style-type: none"> This field has commoners’ rights, meaning that the owners of the field can graze their cattle on the commons. The Local Plan HRA (dated 23 May 2021) has failed to consider the effect of loss of run-back land on the ability to manage Rodborough Common SAC. The loss is also contrary to Minchinhampton NDP (2018) Policy MPEnv4, bullet 3. 	<p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p>
<ul style="list-style-type: none"> Removal of these fields is contrary to the council’s own objective of creating wildlife corridors (reference Stroud Landscapes Project) as it will create a barrier 	<p>The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton	
to wildlife connectivity.	<p>of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.</p> <p>The site allocation policy wording highlights particular on-site specifics to be addressed at the masterplan/ planning application stage, including strategic landscaping to provide accessible open space, minimise landscape impacts within the AONB and safeguard and enhance local biodiversity.</p>
<ul style="list-style-type: none"> Traffic: Concerns over additional traffic through the narrow historic streets of the town centre being generated by new development. Concern over increased commuter traffic on the Commons – change of character and endangerment of cattle. 	<p>Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.</p> <p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination. The site is located within the Rodborough Common SAC core catchment zone. Development proposals within this core catchment zone will be required to contribute to mitigation measures, in accordance with the agreed SAC Avoidance and Mitigation Strategy, in order to avoid an adverse effect on the integrity of the SAC associated with increased recreational activity over the plan period.</p>
<ul style="list-style-type: none"> Impacts on Bulwarks SAM: potential damage during construction phase; and likely use by future residents for leisure and to access the playing fields. 	<p>On-site specifics will be addressed at the masterplan/planning application stage, including design, layout and landscaping to avoid direct impacts on the SAM and to mitigate any indirect impacts on its significance, which is identified in the policy supporting text as a particular issue to be addressed.</p>
<ul style="list-style-type: none"> The school is already beyond capacity. It is a popular school with local parents as well as those in the wider district. 	<p>Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.</p>
<ul style="list-style-type: none"> Minchinhampton is an unsustainable location: very limited employment opportunities; bus service is too limited; a commute is inevitable. 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>Justification for the role of Minchinhampton in the development strategy and the allocation of site PS05 is set out in the Settlement Role and Function Study</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
		<p>Update 2018 (May 2019) (EB72), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4). The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p> <p>Ahead of the EIP, the Council is updating its Highways and IDP/Infrastructure evidence base and documentation. This will be published in due course.</p>
Policy wording modifications: None		
Minchinhampton Local Plan Response Group (891)	<ul style="list-style-type: none"> Paragraphs 3.1.8-3.1.10 relating to PS05 and PS05a are not legally compliant because Minchinhampton NDP's vision is not incorporated into the Plan (ref. Localism Act) 	Topic Paper: Neighbourhood Planning October 2021 (EB5) explains the relationship between current adopted NDPs and the emerging Local Plan. Stroud District Council has assessed all made and emerging plans for any potential Strategic Policy conflict, including Local Site Allocations, and considers there to be no conflict between the proposed allocation of PS05 and the policies in the Minchinhampton NDP. Development of PS05 will be required to address relevant NDP policies through masterplanning and at planning application stage.
	<ul style="list-style-type: none"> Paragraphs 3.1.8-3.1.10 relating to PS05 and PS05a are not legally compliant because the flawed consultation process regarding PS05a as a 'reserved site' did not allow people to comment fully on the relationship between the two sites. 	<p>The Statement of Community Involvement March 2020 (EB2) sets out how Stroud District Council has informed, engaged and consulted people throughout the plan preparation process.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including the results of public consultation.</p>
	<ul style="list-style-type: none"> Growth strategy / location: <ul style="list-style-type: none"> Priority should be given to developing available brownfield sites and sites within the settlement boundary. 	Topic Paper: Housing needs and supply October 2021 (EB8) evidences Council's approach to identifying and assessing housing needs, calculating the minimum residual housing requirement for the whole of Stroud District, and delivery of the different component elements of housing land supply, taking



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton	
<ul style="list-style-type: none"> ○ Greenfield sites within an AONB are not needed and should remain protected. ○ The Plan has not considered reasonable alternatives to building within the AONB and is not based on proportionate evidence with respect to NPPF12, NPPF172, CP2, ES7 relating to housing need, supply, sustainability and location (AONB). 	<p>into account existing commitments with planning permission and a small sites Windfall allowance. (Section 2.5 Housing, Table 2 Calculating our residual housing requirement to 2040 sets out the component elements of housing supply against objectively assessed housing needs and a minimum whole-District residual housing requirement of 8,005 dwellings).</p> <p>Core Policy CP2 identifies Strategic growth and development locations to meet the District’s development needs for the plan period. Local site allocations at Minchinhampton and Painswick are located within the Cotswolds AONB.</p>
<ul style="list-style-type: none"> ● Housing need / affordable housing: consider alternative to allocation by assessing the potential of the social housing already available in the Glebe Estate to be reorganised / intensified (reference Woolaway re-development as prototype). 	<p>The Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) evidences the Council’s strategic approach to allocating sites at Tier 2 settlements within the AONB to meet identified housing needs arising solely from within the AONB, in accordance with National Planning Practice Guidance and the Cotswolds Conservation Board’s AONB Management Plan.</p>
<ul style="list-style-type: none"> ● Housing need / affordable housing: The Local Housing Needs Assessment 2019 for Gloucestershire only provides a starting point for establishing the final housing requirement; the need for housing should be balanced against policies intended to restrict development in AONBs. 	<p>The Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) justifies the allocation of PS05 for up to 80 homes, including 30% (up to 24) affordable homes, setting out local evidence of affordable housing needs which cannot be met in full with any certainty other than from an allocation in the Local Plan. Moreover, it identifies the need to focus limited development at Minchinhampton in order to help maintain the settlement’s diversity and vitality.</p>
<ul style="list-style-type: none"> ● Housing need/ market housing: Market housing is already available (reference to 25 houses for sale on Rightmove at time of writing). There is no reason to doubt that Minchinhampton’s historic delivery rates cannot continue with the current mix of larger brownfield and windfall sites. The draft Local Plan includes a 30% excess in housing provision (CP2) - it would therefore seem unnecessary and unjustified to undertake major development in the AONB. 	<p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including consideration of reasonable alternatives and a primary focus on potential sites lying on the periphery of Tier 1-3 settlements, in accordance with the development strategy. Substantial brownfield sites within the wider parish are remote from the Minchinhampton settlement itself.</p>
<ul style="list-style-type: none"> ● Growth strategy / location: Minchinhampton’s designation as a Tier 2 settlement is not sound 	<p>Justification for the role of Minchinhampton in the development strategy (including its designation as a Tier 2 settlement) and the allocation of site</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
	<p>because the range of services, facilities and retail outlets does not compare with other Tier 2 settlements.</p>	<p>PS05 is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and in the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p> <p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p>
	<ul style="list-style-type: none"> Location / accessibility to services and facilities: not consistent with the NPPF, SDC’s own plan and the adopted Minchinhampton NDP. PS05 is not well located and will significantly increase the reliance on private cars: it is not near to essential services and good transport links. 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>Justification for the role of Minchinhampton in the development strategy and the allocation of site PS05 is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4). The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p> <p>Ahead of the EIP, the Council is updating its Highways and IDP/Infrastructure evidence base and documentation. This will be published in due course.</p>
	<ul style="list-style-type: none"> Access and traffic: <ul style="list-style-type: none"> Paragraphs 3.1.8-3.1.10 relating to PS05 and PS05a are not legally compliant because the proposed access through the Glebe estate has not been fully consulted upon Safe and suitable access cannot be achieved for 	<p>On-site specifics, including pedestrian, cycle and vehicular site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.</p> <p>Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton	
<ul style="list-style-type: none"> ○ all users. ○ Lacks mitigation proposals to deal with additional capacity, congestion and highway safety issues. Will have severe cumulative effect on the local road network, including the existing Glebe estate, the centre of Minchinhampton and the roads across Minchinhampton Common (SSSI) and onto Rodborough Common (SAC). 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p>
<ul style="list-style-type: none"> ● Impact on the Bulwarks SAM: proximity to the scheduled monument makes this site allocation unsound (contrary to NPPF 2, DHC6 and ES10). Likely use by future residents for recreation and to access the playing fields means risk of harm. 	<p>Local Sites Allocation Policy PS05 and supporting text identifies the conservation and enhancement of heritage assets as a particular issue to be addressed, including specifically the avoidance of direct impacts on the SAM, as well as mitigation of any indirect impacts on its significance.</p> <p>On-site specifics will be addressed at the masterplan/planning application stage, including layout and landscaping to avoid and mitigate impacts on the SAM.</p>
<ul style="list-style-type: none"> ● Impacts on Minchinhampton Common (SSSI) and Rodborough Common (SAC): It is not yet clear whether the measures required to avoid the predicted recreational effects are feasible or viable. The HRA has failed to consider the effect of the loss of fall-back land and loss of grazing rights. 	<p>The site is located within the Rodborough Common SAC core catchment zone. Development proposals within this core catchment zone will be required to contribute to mitigation measures, in accordance with the agreed SAC Avoidance and Mitigation Strategy, in order to avoid an adverse effect on the integrity of the SAC associated with increased recreational activity over the plan period.</p> <p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p>
<ul style="list-style-type: none"> ● Removal of Glebe Farm and Tobacconist Farm is contrary to the Stroud Landscapes Project objective of creating wildlife corridors across farmland. 	<p>The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.</p> <p>The site allocation policy wording highlights particular on-site specifics, to be</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
		addressed at the masterplan/ planning application stage, including strategic landscaping to provide accessible open space, minimise landscape impacts within the AONB and safeguard and enhance local biodiversity.
Policy wording modifications: None		
Comment		
National Trust (304)	<ul style="list-style-type: none"> Not consistent with national policy in respect of AONB status and Minchinhampton Common’s SSSI designation. Reference to NPPF para 170 (protecting and enhancing valued landscapes and sites of biodiversity value); para 171 (strategic approach to habitat networks and green infrastructure); para 172 (great weight must be given to conserving landscape and scenic beauty). 	<p>The Council considers Local Site Allocation PS05 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape, biodiversity, historic environment and AONB issues.</p> <p>The Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) evidences the Council’s approach to allocating sites at Tier 2 settlements within the AONB to meet identified housing needs arising solely from within the AONB, in accordance with National Planning Practice Guidance and the Cotswolds Conservation Board AONB Management Plan.</p> <p>The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.</p> <p>The site allocation policy wording highlights particular on-site specifics to be addressed at the masterplan/ planning application stage, including strategic landscaping to provide accessible open space, to minimise landscape impacts within the AONB and safeguard and enhance local biodiversity.</p> <p>The site is located within the Rodborough Common SAC core catchment zone. Development proposals within this core catchment zone will be required to contribute to mitigation measures, in accordance with the agreed SAC Avoidance and Mitigation Strategy, in order to avoid an adverse effect on the integrity of the SAC associated with increased recreational activity over the</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton	
	<p>plan period.</p> <p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p>
<ul style="list-style-type: none"> Proposed housing allocation would increase traffic movements across the Common, threatening the longevity of grazing, which is essential to the management of the Commons and maintenance of important habitats. The Trust and the Minchinhampton and Rodborough Commons Advisory Committee would also welcome traffic mitigation measures over Minchinhampton Common. 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection. The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p> <p>Ahead of the EIP, the Council is updating its Highways and IDP/Infrastructure evidence base and documentation. This will be published in due course.</p>
<ul style="list-style-type: none"> Proposed allocation of up to 80 dwellings is not justified. 	<p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences Council’s approach to identifying and assessing housing needs and calculating the minimum residual (whole-District) housing requirement for the Plan period; it provides further detail on the delivery of different component elements of housing land supply and on how the Local Plan addresses specific housing needs, including both affordable housing and market housing.</p> <p>The Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) evidences the Council’s approach to allocating sites at Tier 2 settlements within the AONB to meet identified housing needs arising solely from within the AONB, in accordance with National Planning Practice Guidance and the Cotswolds Conservation Board AONB Management Plan.</p> <p>The Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) justifies the allocation of PS05 for up to 80 homes,</p>
<ul style="list-style-type: none"> We also consider that there are likely to be locations outside of the AONB and away from ecologically sensitive sites to accommodate 80 dwellings. 	
<ul style="list-style-type: none"> Remove the allocation from the Plan. Alternatively, significantly reduce its size and focus it on essential community facilities and affordable housing for Minchinhampton, to be phased over the long term. 	



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
		including 30% (up to 24) affordable homes, setting out local evidence of affordable housing needs which cannot be met in full with any certainty other than from an allocation in the Local Plan. Moreover, it identifies the need to focus limited development at Minchinhampton in order to help maintain the settlement’s diversity and vitality.
Policy wording modifications: None		
Historic England (813)	<ul style="list-style-type: none"> Archaeological interest (Bulwarks SAM) could affect the future form and capacity of the site. Further archaeological investigation should ideally be undertaken in advance of Examination, to provide greater certainty that the site can accommodate the level of housing currently envisaged and to inform clear advice on a design response. Provide clear advice in the body of the Plan as to what the design response should be in order to conserve historic significance. 	<p>Local Sites Allocation Policy PS05 and supporting text identifies the conservation and enhancement of heritage assets as a particular issue to be addressed, including specifically the avoidance of direct impacts on the SAM, as well as mitigation of any indirect impacts on its significance.</p> <p>On-site specifics will be addressed at the masterplan/planning application stage, including high quality locally-distinctive design to enhance the settlement edge (with buildings not exceeding 2 storeys) and layout and landscaping to avoid and mitigate impacts on the SAM. Use of appropriate expertise to provide an explanation of heritage significance and an assessment of the potential impact of development proposals on any heritage assets (both designated and undesignated), including archaeological remains, is a necessary and justified requirement of Delivery Policy ES10.</p> <p>The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan. In the Statement of Common Ground between Stroud District Council and Historic England, the parties agree to work together and commit to investigating further discrete evidence where appropriate and to work together through the examination process to resolve the outstanding matters by agreeing appropriate modifications to the Local Plan where necessary.</p>
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
190, 487, 497, 669, 781, 825, 853, 894, 927, 944	<ul style="list-style-type: none"> Inevitable increase in car-using households (query need for 2 parking spaces per household) and vehicular traffic, which is contrary to the goal of carbon reduction; <ul style="list-style-type: none"> contrary to Strategic Objective SO4; conflict with core policy DCP1 	<p>New Core Policy DCP1 Delivering Carbon Neutral by 2030 sets out the overarching requirements for all new development, to support the Council's target to become carbon neutral by 2030.</p> <p>Topic Paper – Transport October 2021 (EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures, improvement of public transport opportunities and addressing air quality.</p> <p>The Sustainability Appraisal includes assessment of all sites and reasonable alternatives against SA 10: To ensure that air quality continues to improve based on sustainable access to employment and key services and facilities, SA Report Appendix 3 - 9 (CD3b).</p> <p>Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.</p> <p>On-site specifics, including pedestrian, cycle and vehicular access, to be addressed at the masterplan/ planning application stage, in agreement with Gloucestershire Highways. Parking arrangements and provision across the site shall be subject to negotiation in accordance with the Parking standards for vehicles and cycles, set out in Appendix C of the Plan.</p>
668	<ul style="list-style-type: none"> Development of this agricultural land conflicts with the need to produce food locally in order to reduce food miles / travel footprint 	<p>Sites that are on greenfield land classed as high quality agricultural land (Grades 1, 2 or 3a) are rated red, as having a significant negative (--) effect, for efficiency in land use and protection of soil quality regardless of size. Sites are allocated having regard to Sustainability Appraisal across 17 SA objectives; this is a balanced judgement taking all objectives into consideration, SA Report Appendix 4 (CD3b).</p>
853, 944	<ul style="list-style-type: none"> There will be disruption from unspecified utility work to accommodate 80 new houses on one site and service them with green energy; anticipated audible hum from air source heat pumps. 	<p>Comment noted</p>
Strategic growth and development locations		



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
190, 201, 323, 392, 471, 487, 497, 614, 635, 638, 669, 673, 676, 692, 716, 781, 825, 834, 894, 908, 929, 935, 946	<ul style="list-style-type: none"> • Development (of this scale) within the AONB: <ul style="list-style-type: none"> ○ Development within the AONB should only be permitted if pressure for housing in the town is exceptional (and this is unproven / has not been demonstrated); ○ Creates a precedent for more development of the same unjustified kind within the Cotswolds AONB; ○ Conflict with Strategic Objective SO6 (including reference to para. 2.3.41) ○ This is the only proposed allocation within the AONB. 	<p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences Council’s approach to identifying and assessing housing needs, calculating the minimum residual housing requirement for the whole of Stroud District, and delivery of the different component elements of housing land supply, taking into account existing commitments with planning permission and a small sites Windfall allowance. (Section 2.5 Housing, Table 2 Calculating our residual housing requirement to 2040 sets out the component elements of housing supply against objectively assessed housing needs and a minimum whole-District residual housing requirement of 8,005 dwellings).</p> <p>Core Policy CP2 identifies Strategic growth and development locations to meet the District’s development needs for the plan period. Local site allocations at Minchinhampton and Painswick are located within the Cotswolds AONB.</p>
487, 716	<ul style="list-style-type: none"> • Local Plan housing requirement: <ul style="list-style-type: none"> ○ The plan is based on a 30% oversupply of housing to meet the district’s needs – there is no need for this allocation in order to meet the plan’s housing target; ○ The District’s three or five year supply can be readily accommodated elsewhere: at least 12,520 houses are to be allocated elsewhere in the District. 	<p>The Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) evidences the Council’s strategic approach to allocating sites at Tier 2 settlements within the AONB to meet identified housing needs arising solely from within the AONB, in accordance with National Planning Practice Guidance and the Cotswolds Conservation Board’s AONB Management Plan.</p>
182, 190, 201, 268, 298, 392, 422, 471, 497, 505, 518, 601, 608, 612, 614, 635, 638, 669, 673, 677, 692, 716, 781, 821, 825, 829, 830, 833, 853, 894, 900, 908, 929, 944	<ul style="list-style-type: none"> • Brownfield first, rather than greenfield development: <ul style="list-style-type: none"> ○ Development within the parish should be on brownfield sites, such as Aston Down, Dark Mills; ○ conflict with Strategic Objectives SO5 and SO6 (including reference to para. 2.3.41) 	<p>The Council considers Local Site Allocation PS05 suitable for development to meet the local housing needs of this Tier 2 AONB settlement, in conjunction with modest infill development inside the SDL and (exceptionally) adjacent to it. Justification for the role of Minchinhampton in the development strategy and the allocation of site PS05 to meet identified local needs is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p>
487, 497, 669, 853, 894, 944	<ul style="list-style-type: none"> • Growth strategy: <ul style="list-style-type: none"> ○ The development needs of Minchinhampton settlement and/or the wider parish should be 	<p>Topic Paper: The Development Strategy October 2021 (EB4) sets out the Council’s approach to identifying and assessing potential spatial strategy options and how the development strategy was selected to meet</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
	met through smaller scaled sites / a dispersal strategy	requirements. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including consideration of reasonable alternatives and a primary focus on potential sites lying on the periphery of Tier 1-3 settlements, in accordance with the development strategy. Substantial brownfield sites within the wider parish (such as the former Aston Down airfield and Land at Dark Mills, Brimscombe) are remote from the Minchinhampton settlement.
534	<ul style="list-style-type: none"> The allocation is based on a passive call for sites that cannot be described as positive planning 	Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including consideration of reasonable alternatives.
614, 829,	<ul style="list-style-type: none"> No consultation on the plan as a whole and/or the site 	<p>The Statement of Community Involvement March 2020 (EB2) sets out how Stroud District Council has informed, engaged and consulted people throughout the plan preparation process.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including the results of public consultation.</p>
Settlement hierarchy and place making		
190, 298, 420, 471, 497, 499, 505, 518, 520, 601, 608, 614, 635, 638, 669, 676, 716, 781, 825, 930	<ul style="list-style-type: none"> Minchinhampton is not a sustainable settlement that is suited to growth (of this scale): the town has inadequate access to employment, services and facilities and poor links to public transport; <ul style="list-style-type: none"> Dispute settlement classification as a Tier 2 Local Service Centre. 	<p>The Council considers the proposed Local Site Allocation PS05 to be of appropriate scale and size for this Tier 2 AONB settlement.</p> <p>Justification for the role of Minchinhampton in the development strategy (including its designation as a Tier 2 settlement) and the allocation of site PS05 to meet identified local needs is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
		<p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p> <p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p>
182, 190, 268, 583, 614, 635, 638, 673, 761, 825, 894, 944, 946	<ul style="list-style-type: none"> This allocation will set a precedent for more (speculative) development at Minchinhampton (including some references to further eastward expansion in particular). 	<p>The Council considers Local Site Allocation PS05 suitable for development to meet the current local housing needs of this Tier 2 AONB settlement, in conjunction with modest infill development inside the SDL and (exceptionally) adjacent to it. Paragraph 3.1.10 explains that the Council has identified site PS05a as suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review, subject to evidence of local housing need at that time and the site performing best against reasonable alternatives. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape impacts and comparative assessment against reasonable alternative sites.</p> <p>The development strategy approach of “managed growth” within and adjoining settlement development limits is explained in Section 2.4 Our towns and villages and supported by Core Policies CP2, CP3 and CP15 and Delivery Policy DHC1.</p>
190, 319, 323, 392, 487, 539, 614, 669, 676, 716, 894, 929, 946	<ul style="list-style-type: none"> The site is outside the settlement development limit. 	
524, 821	<ul style="list-style-type: none"> Care must be taken that new development reflects / retains / does not erode the character of Minchinhampton. 	<p>Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development is contextual and appropriate in townscape, local environment, character and amenity terms.</p> <p>On-site specifics, including high quality locally-distinctive design to enhance the settlement edge and conserve and enhance heritage assets will be</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
		<p>addressed at the masterplan/ planning application stage.</p> <p>Development of PS05 will be required to address relevant NDP policies through masterplanning and at planning application stage.</p>
534	<ul style="list-style-type: none"> Scale: On the one hand it is too small to enable contributions to town centre management, whilst on the other it is large enough to cause considerable problems. 	<p>The Council considers the proposed Local Site Allocation PS05 to be of appropriate scale and size for this Tier 2 AONB settlement. Justification for the role of Minchinhampton in the development strategy and the allocation of site PS05, in part to help address pressing demographic factors in order to ensure the long term diversity, vitality and functionality of the settlement, is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p>
692	<ul style="list-style-type: none"> The allocation conflicts with Core Policy CP14 (High Quality Sustainable Development), criteria 7, 13 and 14. 	<p>The Council considers Local Site Allocation PS05 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection. On-site specifics, including pedestrian, cycle and vehicular site access, highway safety and the incorporation of the existing PROW, to be addressed at the masterplan / planning application stage, in agreement with Gloucestershire Highways. Core Policy CP8 New housing development sets out requirements for good design to ensure development is appropriate in townscape, local environment, character and amenity terms.</p> <p>Sites are allocated having regard to Sustainability Appraisal across 17 SA objectives; this is a balanced judgement taking all objectives into consideration, SA Report Appendix 4 (CD3b). The Sustainability Appraisal includes assessment of all sites and reasonable alternatives against SA 10: To ensure that air quality continues to improve based on sustainable access to employment and key services and facilities, SA Report Appendix 3 - 9 (CD3b).</p>
Infrastructure and developer contributions		
716	<ul style="list-style-type: none"> The Development Strategy relating to 	<p>The Council considers the proposed Local Site Allocation PS05 to be of</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
	Minchinhampton seeks to overcome infrastructure deficiencies to deliver enhancements through development; but developer contributions cannot fix historic road constraints.	<p>appropriate scale and size for this Tier 2 AONB settlement. Justification for the role of Minchinhampton in the development strategy and the allocation of site PS05, in part to help address pressing demographic factors in order to ensure the long term diversity, vitality and functionality of the settlement, is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p> <p>Necessary infrastructure will be secured in accordance with Core Policy CP6. On-site provision to be incorporated within the overall design scheme; where off-site provision is required, developer contributions can be secured through appropriate planning obligations to mitigate any adverse impacts. In determining the nature and scale of any provision, the Council will have regard to viability considerations and site specific circumstances.</p> <p>Ahead of the EIP, the Council is updating its IDP/Infrastructure and Highways evidence base and documentation. This will be published in due course.</p>
894	<ul style="list-style-type: none"> Mitigation measures or compensation through CIL are no replacement for the permanent devaluing of the town through overdevelopment. 	
929	<ul style="list-style-type: none"> Any planning development levies would go to Gloucestershire's central funds, with no guarantee that money would be spent in Minchinhampton. 	
Policy wording modifications:		
534	<ul style="list-style-type: none"> Masterplanning: Any Masterplan should be required to cover both PS05 and PS05a, as well as the land connections north and south. Together a proper plan is possible; separately a chaotic result is inevitable. 	<p>Local Sites Allocation Policy PS05 requires a masterplan, to be approved by the District Council, which will detail the way in which land uses and infrastructure will be developed in an integrated and co-ordinated way.</p> <p>PS05a is not a proposed site allocation. Paragraph 3.1.10 explains that the Council has identified site PS05a as suitable for safeguarding to meet Minchinhampton’s potential future needs, should additional greenfield land be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The principle of development will be considered at the next Local Plan review.</p> <p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
214	<ul style="list-style-type: none"> The description is wrong. The site is in fact North East of Tobacconist Road. 	Comment noted
Homes and Communities		
Housing		
66, 821	<ul style="list-style-type: none"> Too dense (including in relation to the character of surrounding area) 	<p>Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.</p> <p>The provision of landscaped open space is a necessary and justified requirement, supported through delivery policy DHC7 and identified in the policy wording for Local Site Allocation PS05 as a particular issue to address.</p> <p>On-site specifics, including layout and strategic landscaping to provide accessible open space, minimise landscape impacts, incorporate the existing PROW and safeguard and enhance local biodiversity, will be addressed at the masterplan/ planning application stage.</p>
929	<ul style="list-style-type: none"> 80 houses on a 20 acre site would be a very low level of housing density (no need to provide additional public open space) 	
190, 192, 201, 268, 319, 323, 392, 420, 422, 471, 487, 497, 499, 505, 518, 520, 583, 606, 608, 612, 614, 619, 622, 623, 635, 638, 644, 668, 669, 673, 676, 677, 716, 761, 825, 830, 833, 894, 901, 908, 925, 927, 930, 944, 946	<ul style="list-style-type: none"> Insufficient evidence to justify the need for 80 houses at Minchinhampton; too many houses 	<p>The Council considers Local Site Allocation PS05 to be of appropriate scale and size for this Tier 2 AONB settlement. Justification for the role of Minchinhampton in the development strategy and the allocation of site PS05 to meet identified local needs is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy (EB4).</p> <p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs.</p>
471, 487, 505, 669, 821, 834, 853, 894,	<ul style="list-style-type: none"> Minchinhampton's housing needs are already being met / are capable of being met by the existing 	Topic Paper: Housing needs and supply October 2021 (EB8) evidences Council's approach to identifying and assessing housing needs, calculating the



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
944	housing supply and / or existing commitments and / or windfalls, which will continue historic rates of delivery	<p>minimum residual housing requirement for the whole of Stroud District, and delivery of the different component elements of housing land supply, taking into account existing commitments with planning permission and a small sites Windfall allowance.</p> <p>The Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) evidences the Council's approach to allocating sites at Tier 2 settlements within the AONB to meet identified housing needs arising solely from within the AONB, in accordance with National Planning Practice Guidance and the Cotswolds Conservation Board AONB Management Plan.</p> <p>The Stroud District Settlement Role and Function Study Update 2018 (May 2019) (EB72) establishes that the Minchinhampton settlement (as opposed to the wider parish) has experienced low historic housing growth. The Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) justifies the allocation of PS05, setting out local evidence of affordable housing needs which cannot be met in full with any certainty other than from an allocation in the Local Plan.</p>
716	<ul style="list-style-type: none"> The Plan promotes rural exception sites and small scale housing in rural areas "in the interests of social sustainability and subject to local community support." But there are no exceptional reasons, nor any local community support for this allocation. 	PS05 is a proposed site allocation, not an exception site.
192	<ul style="list-style-type: none"> Scepticism about the delivery of the full quota of affordable homes. 	<p>Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 4 or more dwellings within Minchinhampton parish. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.</p> <p>The Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) justifies the allocation of PS05 for up to 80 homes, including 30% (up to 24) affordable homes, setting out local evidence of</p>
335, 471, 505, 597, 622, 638, 716, 825, 894, 930	<ul style="list-style-type: none"> Affordable / market housing mix: <ul style="list-style-type: none"> Urgent need for affordable housing is recognised; The mix does not / must be made to reflect local housing needs. Should cater to young families and older (downsizing) couples; Should be limited to affordable-only. 	
471	<ul style="list-style-type: none"> The policy of prioritising people from outside the 	



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
	town and parish for affordable housing if they have a higher need means that local affordable housing need might never be met, irrespective of how many houses are built	affordable housing needs which cannot be met in full with any certainty other than from an allocation in the Local Plan. Local Sites Allocation Policy PS05 stipulates that affordable housing on the site will be for those with a local connection, to address local housing needs within the AONB.
Community facilities		
87, 190, 201, 298, 319, 323, 392, 392, 420, 422, 487, 587, 606, 612, 624, 635, 657, 668, 677, 760, 830, 833, 834, 894, 900, 908, 927, 929, 930, 946	<ul style="list-style-type: none"> The additional 80 homes would put strain on Minchinhampton's existing services and facilities: <ul style="list-style-type: none"> School is already full to capacity; a popular school with local parents as well as those in the wider district. Parents with children moving into the development will be entitled to a place at the school which will lead to overcrowding at the school for the foreseeable future GP surgery is full / under strain The pub is already busy 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course. The Council considers the proposed allocation to be of appropriate scale and size for this Tier 2 AONB settlement. Justification for the role of Minchinhampton in the development strategy and the allocation of site PS05, in part to address pressing demographic factors and to ensure the long term diversity, vitality and functionality of the settlement, is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy (EB4).
692	<ul style="list-style-type: none"> The allocation conflicts with policies HC1 (criterion 9) and DHC5. 	Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities. On-site specifics, including site access, highway safety and the incorporation of the existing public right of way, to be agreed at the planning application stage with Gloucestershire Highways.
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
182, 184, 190, 420, 471, 487, 518, 520, 583, 601, 608, 612,	<ul style="list-style-type: none"> There is a lack local employment and/or a lack of public transport to employment destinations (which will lead to greater commuting by private car). 	Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
614, 622, 635, 638, 668, 677, 692, 825, 833, 853, 894, 901, 908, 925, 929, 930, 944		improvement of public transport opportunities. Justification for the role of Minchinhampton in the development strategy and the allocation of site PS05 is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy (EB4).
669, 853, 944	<ul style="list-style-type: none"> PS05 does not align with the Plan's aim for "housing and employment to be in close proximity" (ref. para 2.3.5), as there is not capacity to generate an equal number of jobs within the settlement. 	The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).
657	<ul style="list-style-type: none"> The site includes land that is rented by two businesses, which will have to cease operations. 	Comment noted
929	<ul style="list-style-type: none"> The loss of Minchinhampton's only campsite is contrary to national planning policy to protect leisure and tourism facilities. 	Comment noted (not relevant to PS05 site)
Retail and town centres		
84, 190, 420, 471, 539, 614, 622, 623, 635, 638, 644, 673, 761, 821, 825, 833, 834, 900, 901, 930	<ul style="list-style-type: none"> Accessibility to Minchinhampton's shops and local centre: <ul style="list-style-type: none"> Good pedestrian access will be essential in order to encourage residents to avoid car use to access Minchinhampton's shops and facilities; Parking in the town is already difficult – this development will exacerbate existing problems; An increase in pedestrian traffic to the town centre will exacerbate existing conflict between diverse road users. 	Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities. On-site specifics, including pedestrian, cycle and vehicular site access, highway safety and the incorporation of the existing PROW, to be addressed at the masterplan / planning application stage, in agreement with Gloucestershire Highways. Justification for the role of Minchinhampton in the development strategy and the allocation of site PS05, in part to address pressing demographic factors and to ensure the long term diversity, vitality and functionality of the settlement, is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy
184, 190, 420, 471, 487, 497, 505, 635, 673, 692, 716, 781, 825, 908	<ul style="list-style-type: none"> Accessibility to shops and town centre facilities elsewhere: <ul style="list-style-type: none"> There is a lack of public transport, which will mean residents are obliged to use cars to access shops and supermarkets (in other settlements). 	



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
	Active travel / walking / cycling to shops is difficult.	(EB4). Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including access to retail facilities and town centre services. The relative accessibility of the site and wider settlement to key services and facilities is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b). Ahead of the EIP, the Council is updating its Highways and IDP/Infrastructure evidence base and documentation. This will be published in due course.
Travel, transport and highways		
66, 75, 173, 182, 184, 190, 201, 268, 298, 323, 392, 420, 422, 471, 487, 497, 520, 524, 529, 534, 539, 583, 587, 601, 606, 608, 612, 614, 619, 623, 624, 635, 638, 644, 657, 661, 668, 673, 676, 692, 716, 761, 781, 821, 825, 829, 830, 831, 833, 890, 894, 900, 901, 908, 925, 929, 927, 930, 935, 946	<ul style="list-style-type: none"> • General increase in traffic volume / cumulative effect on the local road network: <ul style="list-style-type: none"> ○ Volume of housing / number of households will create further congestion for local roads; ○ Endangerment of pedestrians within the town; ○ Will exacerbate existing issues of traffic volume and speeds across the commons; endangerment of cattle (both on the commons and within the town); ○ Ignores existing traffic and parking issues, identified in Minchinhampton NDP; GCC traffic study and plan for Minchinhampton should be carried out before proceeding with further development; ○ No Travel Plan has been produced, contrary to the requirements of NPPF, para 113. 	<p>Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.</p> <p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities. On-site specifics, including pedestrian, cycle and vehicular site access, highway safety and the incorporation of the existing PROW, to be addressed at the masterplan / planning application stage, in agreement with Gloucestershire Highways. Delivery Policy EI12 requires development proposals that are likely to have a significant impact on the local transport network to submit a Transport Assessment, as well as a Travel Plan.</p> <p>The Sustainability Appraisal includes assessment of all sites and reasonable alternatives against SA 10: To ensure that air quality continues to improve based on sustainable access to employment and key services and facilities, SA Report Appendix 3 - 9 (CD3b).</p>
75, 84, 87, 173, 179, 182, 190, 201, 268, 298, 319, 323, 335, 392, 420, 422, 471,	<ul style="list-style-type: none"> • Vehicle access: <ul style="list-style-type: none"> ○ Additional volume of traffic: severe cumulative effect on the local road network, including the existing Glebe estate. 	<p>Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.</p> <p>On-site specifics, including site access and highway safety, to be agreed at the</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
487, 497, 499, 505, 518, 520, 524, 526, 529, 583, 604, 606, 608, 612, 619, 622, 623, 624, 635, 638, 644, 657, 661, 668, 669, 673, 676, 677, 692, 716, 750, 761, 781, 815, 825, 827, 830, 831, 834, 853, 890, 894, 901, 927, 929, 935, 944, 946	<ul style="list-style-type: none"> ○ Glebe estate has existing inadequate access for emergency vehicles. ○ Danger to children's play area and children playing on streets. ○ No prior consultation about the revised site access via the Bulwarks. ○ Disruption during construction phase. 	planning application stage with Gloucestershire Highways.
88, 323, 439, 471, 821, 825, 894,	<ul style="list-style-type: none"> ● Pedestrian / cycle access off Tobacconist road: <ul style="list-style-type: none"> ○ Likely conflict with vehicles already using this route to access The Briars and Glebe Farm; ○ Should use existing public footpath instead; ○ Would multiply by 500% the number of dwellings using Tobacconist Road as walking and cycle access to the town centre. 	On-site specifics, including pedestrian, cycle and vehicular site access, highway safety and the incorporation of the existing public right of way, to be agreed at the planning application stage with Gloucestershire Highways.
84, 182, 184, 190, 268, 298, 420, 422, 471, 487, 505, 539, 583, 601, 608, 612, 614, 622, 624, 635, 638, 669, 676, 677, 692, 716, 761, 825, 890, 908, 925, 929, 930, 946	<ul style="list-style-type: none"> ● There is a lack of public transport, which will lead to greater use of private cars to access employment, services and facilities. <ul style="list-style-type: none"> ○ Alternatives such as active travel / walking / cycling are difficult due to surrounding topography and constraints in the historic town centre. Contrary to NPPF Para.103. ○ Easy, direct all weather and well lit pedestrian access from the proposed estate (and the existing Glebe estate) must be put in place, to avoid driving parents to their cars for the school run or access to local shops. ○ This development will prioritise cars over bikes and cyclists, due to lack of cycling and walking 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including accessibility. The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p> <p>On-site specifics, including pedestrian, cycle and vehicular site access, highway safety and the incorporation of the existing PROW, to be addressed</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
	infrastructure adjacent to the site.	at the masterplan / planning application stage, in agreement with Gloucestershire Highways. Ahead of the EIP, the Council is updating its Highways and IDP/Infrastructure evidence base and documentation. This will be published in due course.
908	<ul style="list-style-type: none"> The site / location does not address the needs of those with disabilities and reduced mobility in relation to all modes of transport 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>On-site specifics, including pedestrian, cycle and vehicular site access, highway safety and the incorporation of the existing PROW, to be addressed at the masterplan / planning application stage, in agreement with Gloucestershire Highways and in accordance with relevant requirements set out in Core Policies CP7, DCP2, CP4 and Delivery Policy EI12.</p>
Infrastructure		
853, 944	<ul style="list-style-type: none"> Works to upgrade sewerage, water supply and other utilities to serve the new development are not specified, so the impact on the village cannot be appreciated. 	<p>All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.</p> <p>All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP (EB69).</p>
Policy wording modifications:		
75, 87, 179, 335, 526	<ul style="list-style-type: none"> Move vehicular site access to the Tetbury road: <ul style="list-style-type: none"> all traffic should be directed eastwards, via the Tetbury road / Hampton Fields / Crackstone (rep. 526). vehicular site access should be via Tobacconist Road, then onto Woefulane Bottom / Tetbury Street (rep. 75). bypass Tobacconist Road, with sole access off Bubblewell (Woefulane Bottom) (rep. 179). 	<p>All suggested site policy modifications will be considered by the Inspectors at the EIP.</p> <p>On-site specifics, including site access, highway safety and the incorporation of the existing public right of way, to be agreed at the planning application stage with Gloucestershire Highways.</p>
526, 781, 827	<ul style="list-style-type: none"> Access directly from Cirencester Road (create new access road). 	



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
88	<ul style="list-style-type: none"> Amend pedestrian and cycle access to Tobacconist Road to utilise the existing public footpath instead. 	
Our Environment and Surroundings		
Natural environment		
182, 201, 268, 422, 471, 487, 505, 518, 529, 583, 635, 638, 661, 668, 677, 716, 760, 825, 894, 908, 929,	<ul style="list-style-type: none"> Loss of grazing land: <ul style="list-style-type: none"> Habitats Regulation Assessment of Stroud Local Plan (HRA) dated 23 May 2021 has failed to consider the effect of the loss of run-back land on the ability to manage Rodborough Common SAC Contrary to Minchinhampton NDP (2018) Policy MPEnv4, bullet 3 	The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.
268, 471, 487, 505, 518, 635, 638, 716, 760, 894,	<ul style="list-style-type: none"> Negative impact on wildlife and biodiversity on site and wider surroundings; <ul style="list-style-type: none"> Potential harm or adverse impact on the nearby SSSI; Likely harmful impacts on the ecology of Minchinhampton and Rodborough Commons; Will not achieve biodiversity net gain. 	<p>The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.</p> <p>On-site specifics, including strategic landscaping to provide accessible open space, minimise landscape impacts and safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.</p> <p>The site is located within the Rodborough Common SAC core catchment zone. Development proposals within this core catchment zone will be required to contribute to mitigation measures, in accordance with the agreed SAC Avoidance and Mitigation Strategy, in order to avoid an adverse effect on the integrity of the SAC associated with increased recreational activity over the plan period.</p> <p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p>
539, 622, 927	<ul style="list-style-type: none"> Excessive people and vehicles will cause air pollution. 	Topic Paper – Transport October 2021 (EB6) sets out the range of transport



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
	Substantial modifications would be required in order to comply with current government directives for pollution levels	evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices and addressing air quality. The Sustainability Appraisal includes assessment of all sites and reasonable alternatives against SA 10: To ensure that air quality continues to improve based on sustainable access to employment and key services and facilities, SA Report Appendix 3 - 9 (CD3b).
935	<ul style="list-style-type: none"> Potential impact on flood risk of lower-lying areas, such as Brimscombe. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
Landscape		
182, 190, 583, 614, 619, 623, 635, 638, 644, 673, 760, 761, 825, 833, 894, 927, 935,	<ul style="list-style-type: none"> Development of the site would conflict with / undermine the Stroud Landscape Project. 	The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services. The site allocation policy wording highlights particular on-site specifics to be addressed at the masterplan/ planning application stage, including strategic landscaping to provide accessible open space, minimise landscape impacts within the AONB and safeguard and enhance local biodiversity.
497, 505, 520, 539, 583, 614, 619, 623, 638, 644, 669, 676, 716, 760, 781, 825, 831, 853, 894, 908, 927, 944	<ul style="list-style-type: none"> Adverse visual impacts on the Cotswolds AONB; conflict with Strategic Objective SO6 (para. 2.3.41); conflict with policy ES7; urbanising effect on the AONB. 	The Council considers Local Site Allocation PS05 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape and visual impacts. Strategic landscaping is a necessary and justified requirement to minimise landscape impacts within the Cotswolds AONB, identified in the policy wording as a particular issue to address. On-site specifics, including strategic landscaping, will be addressed at the masterplan/ planning application stage,

Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
		in accordance with requirements set out in Delivery Policy ES7.
214	<ul style="list-style-type: none"> The site has been promoted for some years and was highlighted in The "Planning for Real" consultation organised by Minchinhampton Parish Council in 2010. This was the forerunner of the NDP. At the time 80% of the consultees supported the allocation at Glebe Farm due to its sustainability and modest impact on the landscape. 	Comment noted
534	<ul style="list-style-type: none"> Minchinhampton NDP noted that an eastward direction would be likely for any future growth other than infill, notwithstanding the AONB, because of more significant environmental constraints to the south and north, and west. However, the allocation does not comply with any of the NDP's specific principles or policies. 	Topic Paper: Neighbourhood Planning October 2021 (EB5) explains the relationship between current adopted NDPs and the emerging Local Plan. Stroud District Council has assessed all made and emerging plans for any potential Strategic Policy conflict, including Local Site Allocations, and considers there to be no conflict between the proposed allocation of PS05 and the policies in the Minchinhampton NDP. Development of PS05 will be required to address relevant NDP policies through masterplanning and at planning application stage.
268	<ul style="list-style-type: none"> Light pollution 	<p>The Council considers Local Site Allocation PS05 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape and visual impacts.</p> <p>Minimising landscape impacts within the Cotswolds AONB is identified in the policy wording as a particular issue to address. On-site specifics, including strategic landscaping, will be addressed at the masterplan/ planning application stage. Delivery policy ES7 requires development proposals that are likely to impact on or create change in the landscape of the Cotswolds AONB to have particular regard to tranquillity and dark skies, amongst other natural and special qualities of the AONB.</p>
Historic environment		
190, 487, 583, 619, 622, 623, 638, 644, 716, 825, 853, 894,	<ul style="list-style-type: none"> Potential harm or adverse impact on the adjacent Scheduled Ancient Monument (SAM), The Bulwarks. <ul style="list-style-type: none"> Archaeological survey should have been done in 	On-site specifics will be addressed at the masterplan/planning application stage, including design, layout and landscaping to avoid direct impacts on the SAM and to mitigate any indirect impacts on its significance, which is



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
908, 944	advance.	<p>identified in the policy supporting text as a particular issue to be addressed. Use of appropriate expertise to provide an explanation of heritage significance and an assessment of the potential impact of development proposals on any heritage assets (both designated and undesignated), including archaeological remains, is a necessary and justified requirement of Delivery Policy ES10.</p> <p>The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan. In the Statement of Common Ground between Stroud District Council and Historic England, the parties agree to work together and commit to investigating further discrete evidence where appropriate and to work together through the examination process to resolve the outstanding matters by agreeing appropriate modifications to the Local Plan where necessary.</p>
471, 668, 716, 831, 944	<ul style="list-style-type: none"> Potential harm or adverse impact on the character and appearance of the Minchinhampton conservation area and the special interest of listed buildings. Potential physical damage to historic buildings, due to additional traffic manoeuvring. 	<p>Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.</p> <p>On-site specifics, including high quality locally-distinctive design to enhance the settlement edge and conserve and enhance heritage assets will be addressed at the masterplan/ planning application stage.</p>
524	<ul style="list-style-type: none"> Design must reflect the character of Minchinhampton as an historic market town and conservation area. 	
Policy wording modifications: None		
Delivery and Monitoring		
173, 184, 190, 201, 268, 298, 392, 420, 422, 471, 487, 499, 505, 518, 520, 529, 534, 583, 601, 606, 608, 612, 614, 619, 622, 623, 635, 638, 644, 661, 668, 669,	<ul style="list-style-type: none"> Ignores or conflicts with the adopted Minchinhampton Neighbourhood Development Plan (NDP) 	<p>Topic Paper: Neighbourhood Planning October 2021 (EB5) explains the relationship between current adopted NDPs and the emerging Local Plan. Stroud District Council has assessed all made and emerging plans for any potential Strategic Policy conflict, including Local Site Allocations, and considers there to be no conflict between the proposed allocation of PS05 and the policies in the Minchinhampton NDP. Development of PS05 will be required to address relevant NDP policies through masterplanning and at planning application stage.</p>



Site Reference: Local Sites Allocation Policy PS05 East of Tobacconist Road, Minchinhampton		
673, 676, 677, 692, 716, 750, 761, 781, 821, 825, 831, 834, 908, 925, 929, 927, 935		
534	<ul style="list-style-type: none"> PS05 is unimplementable 	The site is being promoted by Archstone; their rep (239), summarised above, sets out how they believe sustainable development of this site can be implemented.
946	<ul style="list-style-type: none"> Reference to Planning Application no: 2015/2631/EIAS - Glebe Farm, Minchinhampton 	Comment not relevant to this Policy
Policy wording modifications: None		





Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton			
Number of representations: 72		Support: 3	Object: 62
Stakeholders		Comments	Stroud District Council Response
Support			
DK Planning & Development Ltd for the owner of Tobacconist Farm (275) Site promoter	<ul style="list-style-type: none"> Instructed by the owner of Tobacconist Farm, Tobacconist Road, Minchinhampton to promote the immediate allocation of all or part of site PS05a for residential development, either as part of a wider allocation including all or part of the adjacent site PS05 or separate to and possibly in lieu of the adjacent site. Site PS05a is available, suitable and deliverable for future residential development during the Plan period, either across the whole site or just part of it. It can also be viably and sustainably developed for residential purposes. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>The Council considers the proposed Local Site Allocation PS05 to be of appropriate scale and size for this Tier 2 AONB settlement. Justification for the role of Minchinhampton in the development strategy and the allocation of site PS05 to meet identified local needs is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p>	
	<ul style="list-style-type: none"> Site PS05a had initially been progressed by a site promoter as part of a wider potential site allocation including site PS05. The agreement between the site promoter and the owner of Tobacconist Farm expired in December 2020. 		
	<ul style="list-style-type: none"> Reference to ‘Development in the Cotswolds Area of Outstanding Natural Beauty – Policy Assessment of Draft Allocated Sites’ (May 2021), part of the Local Plan Review evidence base, which concludes that PS05 would not constitute major development in the context of paragraph 172 of the NPPF. <ul style="list-style-type: none"> Many of the findings relating to PS05 (Appendix A) are similarly applicable to PS05a. 	Comment noted	
	<ul style="list-style-type: none"> Landscape sensitivity: Reference to Stroud Landscape Sensitivity Report (2016). PS05 and PS05a are within land parcel reference M06. Medium sensitivity to housing uses. Development could lead to an 	Comment noted	



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
	improvement to the settlement edge, without impinging on open arable farmland or detracting from the character of Minchinhampton, particularly with a supplemented tree buffer.	
	<ul style="list-style-type: none"> Heritage: The impact on the setting of heritage assets, including the Town's Conservation Area and the Bulwark's Scheduled Ancient Monument can be positively managed. 	Comment noted
	<ul style="list-style-type: none"> Biodiversity: The owner is keen on promoting biodiversity across the site such that any development will incorporate considerable enhancements as part of its core development strategy. 	Comment noted
	<ul style="list-style-type: none"> Access: PS05a enables an appropriate highway access onto Tobacconist Road, providing both vehicle and pedestrian access into the centre of Minchinhampton; and linking southwards towards Tetbury, southwest to Nailsworth, north to Stroud or east to Cirencester. 	Comment noted
	<ul style="list-style-type: none"> Housing mix: the owner believes strongly in social integration. Any development will include a mix of house types/sizes as well as affordable and adaptive housing. 	Comment noted
	<ul style="list-style-type: none"> Flood risk: According to the Environment Agency's Flood Maps, the entire site and the potential access position onto Tobacconist Road are not susceptible to flooding from rivers or surface water. 	Comment noted
Policy wording modifications:		



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
	<ul style="list-style-type: none"> The allocation of all or part of site PS05a for residential development either as part of a wider allocation including all or part of the adjacent site PS05 or separate to and possibly in lieu of the adjacent site. 	All suggested policy modifications will be considered by the Inspectors at the EIP.
Object		
Aston Down Action Group (20)	<ul style="list-style-type: none"> The allocation is outside of the Settlement Development Limit. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton's potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p>
	<ul style="list-style-type: none"> Unsound: exceeds the NPPF 2019 threshold for 'major development' in the AONB, which restricts the area for housing as not in excess of 0.5 hectares. 	The Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) evidences the Council's approach to allocating sites at Tier 2 settlements within the AONB to meet identified housing needs arising solely from within the AONB, in accordance with National Planning Practice Guidance and the Cotswolds Conservation Board AONB Management Plan, having regard to paragraph 172 of the NPPF.
Policy wording modifications: None		
Aston Down Action Group (333)	<ul style="list-style-type: none"> Refers back to objections given to PS05: The allocation is not strategic but for identified local need. NPPF Para 77 Rural Housing requires authorities bring forward exception sites to support rural housing needs. This allocation should be reassessed to show its purpose as an exception site and how it is a "limited development" in the context of NPPF Para 172. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton's potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The principle of development will be considered at the next Local Plan review alongside evolution of a development strategy; it is not an exception site.</p> <p>The Council's Policy Assessment of Draft Allocated Sites in the Cotswolds</p>



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
	<ul style="list-style-type: none"> ○ Refers back to objections given to PS05: Scale: the proposed allocation PS05 is not “limited” in “scale and extent”, as required by NPPF Para 77 Rural Housing; and it is not a “small site” (fewer than 10 houses), as defined by Stroud District Residential Commitments 01/04/2020. 	<p>AONB (May 2021) (EB39) evidences the Council’s approach to allocating sites at Tier 2 settlements within the AONB to meet identified housing needs arising solely from within the AONB, in accordance with National Planning Practice Guidance and the Cotswolds Conservation Board AONB Management Plan, having regard to paragraph 172 of the NPPF.</p>
	<ul style="list-style-type: none"> ● Refers back to objections given to PS05: No justification for unnecessary development in the Cotswold AONB. 	
	<ul style="list-style-type: none"> ● Refers back to objections given to PS05: Minchinhampton parish housing needs assessment 2016, identifies a need for 24 affordable homes and 98 market homes. Some of that need has already been supplied, but the evidence base does not adequately acknowledge this. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The principle of development will be considered at the next Local Plan review.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing, for the current Plan period.</p>
	<ul style="list-style-type: none"> ● Refers back to objections given to PS05: The Stroud District 5 Year Housing Land Supply Oct 2020 (Appendix 9-10; pages13-16) identifies that between 2020-2025 there will be delivery of 147 new dwellings within the Parish of Minchinhampton. This will provide an adequate number of dwellings for the Parish for the next 5 years without the need to bring forward an exception site. There is no evidence to support further housing need. 	
<p>Policy wording modifications: None</p>		
<p>Gloucestershire Wildlife Trust (202)</p>	<ul style="list-style-type: none"> ● Not sound or legally compliant, due to unmitigated adverse recreational impacts on the Cotswold Commons and Beechwoods SAC. Not compliant with the Conservation of Habitats and Species Regulations 2017, Strategic Policy S06 or NPPF 174a &b. Evidence not presented to demonstrate how increased recreational pressure from the development will be avoided. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts.</p>



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
	<ul style="list-style-type: none"> Provision of new strategic GI in the form of SANGs will be necessary to avoid increased recreational impacts on the Severn Estuary SPA, SAC and RAMSAR sites. Ideally this should be delivered strategically and in combination with other developments affecting the SAC. 	<p>Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific requirements, potentially including mitigation measures and green infrastructure.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection. The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p> <p>The site is located within the Rodborough Common SAC and Cotswold Beechwoods SAC core catchment zones and the Severn Estuary SAC, SPA and Ramsar core catchment zone. Development proposals within these core catchment zones will be required to contribute to mitigation measures, in accordance with the agreed SAC Avoidance and Mitigation Strategy, in order to avoid an adverse effect on the integrity of the SAC associated with increased recreational activity over the plan period.</p>
Policy wording modifications: None		
National Trust (304)	<ul style="list-style-type: none"> Not consistent with national policy in respect of AONB status and Minchinhampton Common’s SSSI designation. Reference to NPPF para 170 (protecting and enhancing valued landscapes and sites of biodiversity value); para 171 (strategic approach to habitat networks and green infrastructure); para 172 (great weight must be given to conserving landscape and scenic beauty). <ul style="list-style-type: none"> Reference to the Stroud Landscape Project https://www.nationaltrust.org.uk/minchinhampton-and-rodborough-commons/features/space-for-nature-project There are likely to be alternative locations outside of the AONB and away from ecologically sensitive sites to accommodate additional dwellings. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape sensitivity and AONB impacts.</p>



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
	<ul style="list-style-type: none"> • Remove the allocation from the Plan. • Allocation for housing would increase traffic movements across the Common, threatening the longevity of grazing, which is essential to the management of the Commons and maintenance of important habitats. <ul style="list-style-type: none"> ○ The Trust and the Minchinhampton and Rodborough Commons Advisory Committee would also welcome traffic mitigation measures over Minchinhampton Common. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific requirements, potentially including mitigation measures, highways, active travel and transport requirements.</p>
Policy wording modifications: None		
Minchinhampton Parish Council (504)	<ul style="list-style-type: none"> • Minchinhampton PC opposes any Local Plan that includes PS05 and PS05a Land East of Tobacconist Road within its proposals. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape sensitivity and AONB impacts.</p> <p>The Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) evidences the Council’s approach to allocating sites at Tier 2 settlements within the AONB to meet identified housing needs arising solely from within the AONB, in accordance with National Planning Practice Guidance and the Cotswolds Conservation Board AONB Management Plan, having regard to paragraph 172 of the NPPF.</p>
	<ul style="list-style-type: none"> • Without PS05, PS05a is unnecessary and sends an inappropriate message to developers that the whole land parcel, comprising both this site and PS05, can be treated with potential disregard for consequence. <ul style="list-style-type: none"> ○ PS05a fails to signal a deterrent to further speculative development proposals, because it is un evidenced and unjustified: The necessary ecological, archaeological and highways studies have not been done (for either PS05 or PS05a). It is vital that any development proposal in the Parish, given all its constraints, be robustly justified from the start to deter further speculative proposals. None of that has been done. 	
	<ul style="list-style-type: none"> • Site location: Development of the town itself is restricted to the north and west (protected landscapes) and south (geological constraints) and 	



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton	
<p>can theoretically only therefore go east. But the safeguarding of PS05a is inappropriate: AONB issues, access difficulties, serious intrusion into open countryside. Development pressure cannot be entertained without consequent damage to nationally important landscapes, protected by statute and within institutional protection.</p>	
<ul style="list-style-type: none"> • Growth strategy / scale: Growth in the Parish should be organic, pragmatic, and not forced. A single growth point will distort and acerbate absorption problems. 	
<ul style="list-style-type: none"> • The site was not identified as development land within the Minchinhampton Neighbourhood Development Plan. The MNDP is a formally adopted document and is material to any planning consideration. The Local Plan Review has failed to recognise its value and expectations and is therefore fundamentally flawed as far as this Parish is concerned. 	<p>Topic Paper: Neighbourhood Planning October 2021 (EB5) explains the relationship between current adopted NDPs and the emerging Local Plan. Stroud District Council has assessed all made and emerging plans for any potential Strategic Policy conflict. Development of PS05 and any future development of PS05a will be required to address relevant NDP policies through masterplanning and at planning application stage.</p>
<ul style="list-style-type: none"> • Housing need: housing delivery within Minchinhampton Parish has consistently met a requirement over at least the last 20 years in excess of 8 dwellings a year. No allocation is needed to accommodate realistic growth. (Reference to historic growth and schemes such as the Tynings, Old Common and ongoing Wimberley Mills). 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy.</p>
<ul style="list-style-type: none"> • Housing need and market / affordable housing mix: market housing is not required in order to enable sufficient affordable dwellings for the Parish. What is needed is subsidised land for social housing, met through exceptions sites policies. Restricted availability of housing land within the Parish and inflated land values inhibit truly affordable projects. 	<p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing, for the current Plan period.</p>



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton	
<ul style="list-style-type: none"> Growth strategy / location: Should be brownfield before greenfield allocations. Why has the site at Dark Mills (lapsed planning permission for 55 sheltered housing units) been overlooked by the Local Plan review? 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p>
<ul style="list-style-type: none"> Access: the site cannot be accessed without severe complication. Would increase traffic through the Glebe estate: narrow roads; hazardous to children playing; would require parked vehicles to be off-roaded; detrimental to emergency vehicle access. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific access, highways and infrastructure requirements.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection, including access and accessibility.</p> <p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p>
<ul style="list-style-type: none"> Mitigation: nothing can be entertained to mitigate the damage that any access through this land would deliver to the single track accesses into the balance of Minchinhampton, a protected conservation area. 	
<ul style="list-style-type: none"> Services and facilities: additional homes will offer only marginal benefit to the viability of what remains, and will add to school pressure. The Town itself cannot deliver everything needed for convenient existence. 	
<ul style="list-style-type: none"> Transport: No further development should be entertained until ongoing work on a Parish-wide speed and parking review is complete, and its conclusion implemented. Car-reliant rural area. Inadequate bus service. 	
<ul style="list-style-type: none"> Site / location: The site’s value as back-up winter grazing has been overlooked. 	
<p>Policy wording modifications: None</p>	



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
<p>CPRE Gloucestershire (847)</p>	<ul style="list-style-type: none"> CPRE objects strongly to the inclusion of sites PS05 and PS05a. This site contravenes the following policies in the revised Local Plan: ES7, SO6, DCP1, CP2, HC1, DHC5, DHC6, CP14, ES3, ES6, ES10 and DES2. CPRE urges the inspector to remove these sites from the Plan. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing, for the current Plan period.</p> <p>The Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) evidences the Council’s approach to allocating sites at Tier 2 settlements within the AONB to meet identified housing needs arising solely from within the AONB, in accordance with National Planning Practice Guidance and the Cotswolds Conservation Board AONB Management Plan, having regard to paragraph 172 of the NPPF.</p>
	<ul style="list-style-type: none"> Housing need: CPRE disputes the housing need assertion from Stroud District Council. 2016 Housing Needs Survey from GRCC, commissioned by the Parish Council to support NDP preparation, identified need for 24 affordable houses. Minchinhampton Parish has grown by just over 8 houses per annum historically, suggesting that there is plenty of scope to achieve the 24 affordable target within the next few years, without any input from this development. 	
	<ul style="list-style-type: none"> Growth strategy / scale: the allocation is contrary to NDP, which expressed the community wish that 24 affordable homes should be dispersed in small groups of 5 or 6 rather than in a large development. 	
	<ul style="list-style-type: none"> Market housing: there is no legal argument for pressuring the AONB to provide market housing. Reference NPPF (paragraphs 171 and 172) and the Cotswold Conservation Board management guidelines. Sufficient market housing for the Parish can be delivered through existing commitments (Wimberley Mills and Butt Street) and by utilising brownfield land at Dark Mills. 	
	<ul style="list-style-type: none"> A greenfield site, outside settlement development limits; safeguarding of PS05a (and development of PS05) may act as precedent for increased greenfield development on this side of town. 	
	<ul style="list-style-type: none"> Access through the housing estate to the north is impossible. Alternative access is not possible: narrow 	



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
	lanes or third party land ownership.	next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific access and highways requirements.
	<ul style="list-style-type: none"> Minchinhampton is an unsustainable location: very limited employment opportunities; bus service is too limited; a commute is inevitable. 	<p>Justification for the role of Minchinhampton in the development strategy (including its designation as a Tier 2 settlement) and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and in the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p> <p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p>
	<ul style="list-style-type: none"> Impact on AONB, Minchinhampton Common SSSI and Rodborough Common SAC: Both commons are home to rare plant and animal species, and are grazed for 6 months of the year by free-ranging cattle with 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has</p>



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
	<p>unimpeded access to the road network. Increase in vehicular and foot traffic would harm a delicately balanced ecosystem and landscape views, contrary to NPPF paragraph 175(b).</p>	<p>been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific requirements, potentially including mitigation measures, strategic landscaping, green infrastructure and biodiversity net gain requirements, layout and design, access, highways, active travel and transport requirements.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including AONB impacts, landscape sensitivity, heritage sensitivity and biodiversity impacts.</p> <p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p>
	<ul style="list-style-type: none"> Traffic: Concerns over additional traffic through the narrow historic streets of the town centre being generated by new development. Concern over increased commuter traffic on the Commons – change of character and endangerment of cattle. 	
	<ul style="list-style-type: none"> This field has commoners’ rights, meaning that the owners of the field can graze their cattle on the commons. The Local Plan HRA (dated 23 May 2021) has failed to consider the effect of loss of run-back land on the ability to manage Rodborough Common SAC. The loss is also contrary to Minchinhampton NDP (2018) Policy MPEnv4, bullet 3. 	
	<ul style="list-style-type: none"> Impacts on Bulwarks SAM: likely use by future residents for leisure and to access the playing fields. 	
	<ul style="list-style-type: none"> Removal of these fields is contrary to the council’s own objective of creating wildlife corridors (reference Stroud Landscaped Project) as it will create a barrier to wildlife connectivity. 	
	<ul style="list-style-type: none"> The school is already beyond capacity. It is a popular school with local parents as well as those in the wider district. 	
<p>Policy wording modifications: None</p>		
Minchinhampton	<ul style="list-style-type: none"> Paragraphs 3.1.8-3.1.10 relating to PS05 and PS05a 	Topic Paper: Neighbourhood Planning October 2021 (EB5) explains the



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
Local Plan Response Group (891)	are not legally compliant because Minchinhampton NDP's vision is not incorporated into the Plan (ref. Localism Act).	relationship between current adopted NDPs and the emerging Local Plan. Stroud District Council has assessed all made and emerging plans for any potential Strategic Policy conflict, including Local Site Allocations, and considers there to be no conflict between the proposed allocation of PS05 and the policies in the Minchinhampton NDP.
	<ul style="list-style-type: none"> • Risks relating to 'reserved' status / flawed consultation process: <ul style="list-style-type: none"> ○ The present landowner may petition to have PS05a allocated (rather than safeguarded / reserved), but the Local Planning Strategy team were unaware of this. ○ The proposal to 'safeguard' the site (rather than allocate it) may mean that some consultees focus their responses on the more tangible / immediate development of PS05, rather than addressing issues relating to PS05a. ○ Paragraphs 3.1.8-3.1.10 relating to PS05 and PS05a are not legally compliant due to flawed consultation process regarding PS05a as a 'reserved site' did not allow people to comment fully on the relationship between the two sites. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton's potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The principle of development will be considered at the next Local Plan review.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including the results of public consultation.</p> <p>The Statement of Community Involvement March 2020 (EB2) sets out how Stroud District Council has informed, engaged and consulted people throughout the plan preparation process.</p>
	<ul style="list-style-type: none"> • Growth strategy / location: Priority should be given to developing available brownfield sites and sites within the settlement boundary. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton's potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p>
	<ul style="list-style-type: none"> • Growth strategy / location: Greenfield sites within an AONB are not needed and should remain protected. The Plan has not considered reasonable alternatives to building within the AONB and is not based on proportionate evidence with respect to NPPF12, NPPF172, CP2, ES7 relating to housing need, supply, sustainability and location (AONB). • Growth strategy / location: Minchinhampton's designation as a Tier 2 settlement is not sound 	



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
	<p>because the range of services, facilities and retail outlets does not compare with other Tier 2 settlements.</p>	<p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing, for the current Plan period.</p>
	<ul style="list-style-type: none"> Housing need / affordable housing: consider alternative to allocation by assessing the potential of the social housing already available in the Glebe Estate to be reorganised / intensified (reference Woolaway re-development as prototype). 	<p>The Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) evidences the Council’s approach to allocating sites at Tier 2 settlements within the AONB to meet identified housing needs arising solely from within the AONB, in accordance with National Planning Practice Guidance and the Cotswolds Conservation Board AONB Management Plan, having regard to paragraph 172 of the NPPF.</p>
	<ul style="list-style-type: none"> Housing need / affordable housing: The Local Housing Needs Assessment 2019 for Gloucestershire only provides a starting point for establishing the final housing requirement; the need for housing should be balanced against policies intended to restrict development in AONBs. 	<p>Justification for the role of Minchinhampton in the development strategy (including its designation as a Tier 2 settlement) and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and in the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p>
	<ul style="list-style-type: none"> Housing need/ market housing: Market housing is already available (reference to 25 houses for sale on Rightmove at time of writing). There is no reason to doubt that Minchinhampton’s historic delivery rates cannot continue with the current mix of larger brownfield and windfall sites. The draft Local Plan includes a 30% excess in housing provision (CP2) - it would therefore seem unnecessary and unjustified to undertake major development in the AONB. 	
	<ul style="list-style-type: none"> Location / accessibility to services and facilities: not consistent with the NPPF, SDC’s own plan and the adopted Minchinhampton NDP. PS05a is not well located and will significantly increase the reliance on private cars: it is not near to essential services and good transport links. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific access, active travel and transport requirements.</p>
		<p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out</p>



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton	
	<p>the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p>
<ul style="list-style-type: none"> • Access and traffic: <ul style="list-style-type: none"> ○ Paragraphs 3.1.8-3.1.10 relating to PS05 and PS05a are not legally compliant because proposed access through the Glebe estate has not been fully consulted upon; ○ safe and suitable access cannot be achieved for all users. Lacks mitigation proposals to deal with additional capacity, congestion and highway safety issues. Will have severe cumulative effect on the local road network, including the existing Glebe estate, the centre of Minchinhampton and the roads across Minchinhampton Common (SSSI) and onto Rodborough Common (SAC). 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific access, highways and transport requirements.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including access, accessibility and the results of public consultation.</p>
<ul style="list-style-type: none"> • Impact on the Bulwarks SAM: proximity to the scheduled monument makes this site allocation unsound (contrary to NPPF 2, DHC6 and ES10). Likely use by future residents for recreation and to access the playing fields means risk of harm. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific requirements, potentially including mitigation measures, strategic landscaping, green infrastructure and biodiversity net gain, layout and design.</p>
<ul style="list-style-type: none"> • Impacts on Minchinhampton Common (SSSI) and Rodborough Common (SAC): It is not yet clear whether the measures required to avoid the predicted recreational effects are feasible or viable. The HRA has failed to consider the effect of the loss of fall-back land and loss of grazing rights. 	
<ul style="list-style-type: none"> • Removal of Glebe Farm and Tobacconist Farm is 	



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
	<p>contrary to the Stroud Landscapes Project objective of creating wildlife corridors across farmland.</p>	<p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape sensitivity, heritage sensitivity, and biodiversity impacts.</p> <p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p>
Policy wording modifications: None		
<p>RCA Regeneration Ltd for Piper Homes (877)</p>	<ul style="list-style-type: none"> We consider that rather than safeguarding land, sites need to be brought forward in multiple locations to proactively deal with the identified affordability issues now. 	<p>The Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) evidences the Council’s approach to allocating sites at Tier 2 settlements within the AONB to meet identified housing needs (including affordable housing) arising solely from within the AONB, in accordance with National Planning Practice Guidance and the Cotswolds Conservation Board AONB Management Plan, having regard to paragraph 172 of the NPPF.</p> <p>The Council considers Local Site Allocation PS05 suitable for development to meet the local housing needs of this Tier 2 AONB settlement for the Plan period, in conjunction with modest infill development inside the SDL and (exceptionally) adjacent to it. Paragraph 3.1.10 explains that the Council has identified site PS05a as suitable for safeguarding to meet Minchinhampton’s potential future needs, should additional greenfield land be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives).</p> <p>The development strategy approach of “managed growth” within and adjoining settlement development limits is explained in Section 2.4 Our towns and villages and supported by Core Policies CP2, CP3 and CP15 and Delivery Policy DHC1.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape impacts and comparative assessment against reasonable alternative sites.</p>



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
		Topic Paper: Housing needs and supply October 2021 (EB8) evidences Council’s approach to identifying and assessing housing needs, including affordable housing, and calculating the minimum residual (whole-District) housing requirement for the Plan period.
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
190, 201, 497, 781, 825, 853	<ul style="list-style-type: none"> Inevitable increase in car-using households (query need for 2 parking spaces per household) and vehicular traffic, which is contrary to the goal of carbon reduction. 	The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific requirements, including infrastructure.
853	<ul style="list-style-type: none"> There will be disruption from unspecified utility work to service new homes with green energy; anticipated audible hum from air source heat pumps. <ul style="list-style-type: none"> The area is identified as sensitive for medium to large scale solar development and wind turbines. 	
Strategic growth and development locations		
190, 298, 422, 471, 497, 505, 532, 601, 608, 635, 638, 644, 645, 669, 673, 677, 692, 716, 750, 781, 825, 829, 830, 894, 908, 927	<ul style="list-style-type: none"> Brownfield first, rather than greenfield development: <ul style="list-style-type: none"> Development within the parish should be on brownfield sites, such Dark Mills; Smaller scale brownfield sites and community initiatives should be supported to meet local demand 	The Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) evidences the Council’s approach to allocating sites at Tier 2 settlements within the AONB to meet identified housing needs (including affordable housing) arising solely from within the AONB, in accordance with National Planning Practice Guidance and the Cotswolds Conservation Board AONB Management Plan, having regard to paragraph 172 of the NPPF.
190, 201, 392, 471, 487, 497, 505, 539, 644, 669, 673, 676,	<ul style="list-style-type: none"> Development (of this scale) within the AONB: <ul style="list-style-type: none"> Development within the AONB is unjustified. Creates a precedent for more development of the 	The Council considers Local Site Allocation PS05 suitable for development to meet the local housing needs of this Tier 2 AONB settlement for the Plan period, in conjunction with modest infill development inside the SDL and



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
692, 716, 750, 781, 894, 908, 935	same unjustified kind within the Cotswolds AONB.	(exceptionally) adjacent to it.
487, 716	<ul style="list-style-type: none"> Local Plan housing requirement: <ul style="list-style-type: none"> The plan is based on a 30% oversupply of housing to meet the district’s needs – there is no need for this allocation in order to meet the plan’s housing target; The District’s three or five year supply can be readily accommodated elsewhere: at least 12,520 houses are to be allocated elsewhere in the District. 	Paragraph 3.1.10 explains that the Council has identified site PS05a as suitable for safeguarding to meet Minchinhampton’s potential future needs, should additional greenfield land be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts.
487, 669, 853, 894	<ul style="list-style-type: none"> Growth strategy: <ul style="list-style-type: none"> Minchinhampton’s development need should be met through smaller scaled sites / a dispersal strategy. 	The development strategy approach of “managed growth” within and adjoining settlement development limits is explained in Section 2.4 Our towns and villages and supported by Core Policies CP2, CP3 and CP15 and Delivery Policy DHC1.
539, 622, 829	<ul style="list-style-type: none"> No prior consultation / insufficient consultation on the proposal to safeguard this site. 	Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape impacts, comparative assessment against reasonable alternative sites and the results of public consultation.
534	<ul style="list-style-type: none"> Future growth strategy: As Planning Authority, Stroud District Council should fulfil its duty to ‘secure the wise use of land’, and undertake or sponsor investigations to see if there is an acceptable means of managing the gradual growth of Minchinhampton without serious intrusion in to the AONB, and providing benefits to the town. Such a proper planned solution might require compulsion to acquire access, in which case SDC would of course have to justify this against alternatives, including examining whether there is a justification for the growth proposed in the plan. 	Topic Paper: Housing needs and supply October 2021 (EB8) evidences Council’s approach to identifying and assessing housing needs, including affordable housing, and calculating the minimum residual (whole-District) housing requirement for the Plan period.
Settlement hierarchy and place making		
471, 505, 644, 669, 716, 927	<ul style="list-style-type: none"> Minchinhampton is not a sustainable settlement that is suited to growth (of this scale): the town has inadequate access to employment, services and 	Justification for the role of Minchinhampton in the development strategy (including its designation as a Tier 2 settlement) and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019)



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
	<p>facilities and poor links to public transport;</p> <ul style="list-style-type: none"> ○ Dispute settlement classification as a Tier 2 Local Service Centre. ○ Dispute that this proposal is consistent with the Plan's strategy of "modest" development at Tier 2 settlements (para. 2.5.8). 	<p>(EB72), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and in the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p> <p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton's potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts.</p>
182, 190, 583, 635, 638, 645, 761, 825, 894	<ul style="list-style-type: none"> ● This allocation will set a precedent for more development at Minchinhampton (including some references to further eastward expansion in particular). 	
190, 392, 487, 539, 644, 669, 676, 692, 716, 894	<ul style="list-style-type: none"> ● The site is outside the settlement development limit. 	
644, 669	<ul style="list-style-type: none"> ● Dispute that this proposal is consistent with the Plan's strategy that "fewer and smaller development sites will be focused on meeting local housing needs" development at Minchinhampton (para. 2.3.21). 	<p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p>
471, 505	<ul style="list-style-type: none"> ● The Local Plan is not legally compliant as no proposals have been included in respect to PS05a, except that it is reserved for future development, so it is difficult to make representations on something that is unknown in terms of access, size and type. <ul style="list-style-type: none"> ○ There should be a proper consultation on the type of development, size and access. 	<p>Local Sites Allocation Policy PS05 requires a masterplan, to be approved by the District Council, which will detail the way in which land uses and infrastructure for that site will be developed in an integrated and co-ordinated way.</p> <p>PS05a is not a proposed site allocation. Paragraph 3.1.10 explains that the Council has identified site PS05a as suitable for safeguarding to meet Minchinhampton's potential future needs, should additional greenfield land be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further</p>
214, 534	<ul style="list-style-type: none"> ● Positive 'good' planning clearly requires that both PS05 and PS05a be considered in a coordinated way. <ul style="list-style-type: none"> ○ It would be more satisfactory if both PS05 and PS05a were withdrawn to allow studies to be carried out prior to the next Local Plan Review. 	



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
	<ul style="list-style-type: none"> ○ PS05a should be considered through the next Local Plan Review 	<p>scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific requirements.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including the results of public consultation.</p> <p>The Statement of Community Involvement March 2020 (EB2) sets out how Stroud District Council has informed, engaged and consulted people throughout the plan preparation process.</p>
716	<ul style="list-style-type: none"> ● PS05a would be worse than PS05, as it would be more disconnected from adjoining housing areas. 	
Infrastructure and developer contributions		
853	<ul style="list-style-type: none"> ● Minchinhampton has poor internet and poor water pressure. <ul style="list-style-type: none"> ○ Any additional sewerage and electrical works and upgrading the water supply to the village are not specified, so the impact on the village cannot be appreciated in the Plan. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton's potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific infrastructure requirements.</p>
716	<ul style="list-style-type: none"> ● The Development Strategy relating to Minchinhampton seeks to overcome infrastructure deficiencies to deliver enhancements through development; but developer contributions cannot fix historic road constraints. 	
894	<ul style="list-style-type: none"> ● Mitigation measures or compensation through CIL are no replacement for the permanent devaluing of the town through overdevelopment. 	
Policy wording modifications:		
534	<ul style="list-style-type: none"> ● Masterplanning: Any Masterplan should be required to cover both PS05 and PS05a, as well as the land connections north and south. Together a proper plan is possible; separately a chaotic result is inevitable. 	<p>Local Sites Allocation Policy PS05 requires a masterplan, to be approved by the District Council, which will detail the way in which land uses and infrastructure for that site will be developed in an integrated and co-ordinated way.</p> <p>PS05a is not a proposed site allocation. Paragraph 3.1.10 explains that the</p>



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
		<p>Council has identified site PS05a as suitable for safeguarding to meet Minchinhampton’s potential future needs, should additional greenfield land be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific requirements.</p> <p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
Homes and Communities		
Housing		
<p>190, 192, 201, 268, 420, 422, 471, 487, 497, 505, 583, 606, 619, 622, 623, 635, 638, 645, 657, 668, 673, 716, 761, 825, 830, 894, 901, 908, 927</p>	<ul style="list-style-type: none"> • Insufficient evidence to justify the need for more housebuilding at Minchinhampton; <ul style="list-style-type: none"> ○ too many houses. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific requirements.</p>
<p>422, 497, 583, 622, 635, 645, 676, 82</p>	<ul style="list-style-type: none"> • Quantity and type of housing does not reflect Minchinhampton’s housing need 	<p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p>
<p>471, 487, 505, 644, 669, 853, 894</p>	<ul style="list-style-type: none"> • Minchinhampton’s housing needs are already being met / are capable of being met by the existing housing supply and / or existing commitments and / or windfalls, which will continue historic rates of delivery. <ul style="list-style-type: none"> ○ Re-examine data on housing demand in Minchinhampton and the way this is being met by existing building projects and housing stock turnover. 	<p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing, for the current Plan period.</p>



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
497, 669	<ul style="list-style-type: none"> Smaller scale brownfield sites and community initiatives should be supported instead, to meet with evidenced local demand (including for low cost housing). 	<p>The Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) evidences the Council’s approach to allocating sites at Tier 2 settlements within the AONB to meet identified housing needs arising solely from within the AONB, in accordance with National Planning Practice Guidance and the Cotswolds Conservation Board AONB Management Plan, having regard to paragraph 172 of the NPPF.</p> <p>Justification for the role of Minchinhampton in the development strategy (including its designation as a Tier 2 settlement) and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and in the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).</p>
716	<ul style="list-style-type: none"> The Plan promotes rural exception sites and small scale housing in rural areas "in the interests of social sustainability and subject to local community support." But there are no exceptional reasons, nor any local community support for this allocation. 	
716	<ul style="list-style-type: none"> NPPF (para 14) specifically advises against the allocation of housing land where a Neighbourhood Plan has considered and not included a specific site. 	
192	<ul style="list-style-type: none"> Scepticism about the delivery of the full quota of affordable homes. 	
825	<ul style="list-style-type: none"> Acknowledge the need for affordable housing; but this is not a “sensible proposal” for delivering it. 	
66	<ul style="list-style-type: none"> Social cohesion / integration: More estate housing will create an unbalanced town. 	
Community facilities		
66, 190, 298, 420, 422, 539, 635, 657, 677, 750, 830, 894, 908, 927	<ul style="list-style-type: none"> Additional homes would put strain on Minchinhampton’s existing services and facilities: <ul style="list-style-type: none"> School is already full to capacity; will lead to overcrowding at the school for the foreseeable future; if children cannot be accommodated at the local school they will generate additional car traffic to schools elsewhere. GP surgery is full / under strain. Chemist won’t cope with additional demand/increased population. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific infrastructure requirements.</p>
908	<ul style="list-style-type: none"> The site / location does not address the needs of those with disabilities and reduced mobility. 	
Policy wording modifications: None		
Economy and Infrastructure		



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
Employment		
190, 471, 505, 539, 583, 601, 608, 622, 635, 638, 644, 645, 669, 676, 677, 853, 894, 908, 927,	<ul style="list-style-type: none"> There is a lack local employment and/or a lack of public transport to employment destinations (which will lead to greater commuting by private car), making this an unsustainable location for further growth. <ul style="list-style-type: none"> Development should be closer to places where there is good employment reducing the need to travel long distances. 	Justification for the role of Minchinhampton in the development strategy (including its designation as a Tier 2 settlement) and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and in the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).
644, 669, 853	<ul style="list-style-type: none"> PS05 does not align with the Plan's strategic aim for "housing and employment to be in close proximity" (ref. para 2.3.5), as there is not capacity to generate an equal number of jobs within the settlement. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton's potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts.</p> <p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p>
Retail and town centres		
420, 583, 635, 638, 645, 673, 761	<ul style="list-style-type: none"> Accessibility to Minchinhampton's shops and local centre: <ul style="list-style-type: none"> Parking in the town is already difficult – this development will exacerbate existing problems. 	Justification for the role of Minchinhampton in the development strategy (including its designation as a Tier 2 settlement) and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and in the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).
471, 505, 716, 908	<ul style="list-style-type: none"> Accessibility to shops and town centre facilities elsewhere: <ul style="list-style-type: none"> There is a lack of public transport, which will mean residents are obliged to use cars to access shops and supermarkets (in other settlements). Active travel / walking / cycling to shops is difficult. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton's potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The principle of development will be considered at the next Local Plan review, alongside</p>



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
		<p>evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific access, active travel and transport requirements.</p> <p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p>
Travel, transport and highways		
190, 201, 298, 420, 422, 487, 505, 532, 539, 583, 601, 604, 606, 619, 623, 635, 638, 644, 645, 657, 661, 669, 673, 676, 677, 692, 716, 761, 781, 825, 829, 830, 831, 894, 901, 908, 927, 935,	<ul style="list-style-type: none"> • General increase in traffic volume / cumulative effect on the local road network: <ul style="list-style-type: none"> ○ Volume of housing / number of households will create further congestion for local roads. ○ Endangerment of pedestrians within the town. ○ Ignores / will exacerbate existing traffic congestion and parking issues within the town (which were highlighted in the Minchinhampton NDP) ○ Volume of housing / number of households will increase air pollution ○ Will exacerbate existing issues of traffic volume and speeds across the commons; endangerment of cattle (both on the commons and within the town) ○ No Travel Plan has been produced, contrary to the requirements of NPPF, para 113. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton's potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific access, highways and transport requirements.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including access, accessibility and the results of public consultation.</p> <p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p>
87, 190, 214, 268, 298, 392, 420, 422, 471, 487, 497, 505, 526, 532, 534, 583, 604, 606, 619, 622, 623, 635, 638, 644,	<ul style="list-style-type: none"> • Vehicle access: <ul style="list-style-type: none"> ○ Additional volume of traffic: severe cumulative effect on the local road network, including the existing Glebe estate. ○ No detail about likely site access. ○ No prior consultation about the (assumed) site 	



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
645, 668, 669, 673, 676, 677, 692, 716, 750, 781, 825, 827, 830, 831, 853, 894, 901, 908, 927, 935	<ul style="list-style-type: none"> access via the Bulwarks (as per PS05). ○ Should an alternative access be considered (e.g. via Tobacconist Road / Tetbury Street), the hazards and impacts would be equal or worse. ○ Access via Tobacconist Road is not possible / not available. ○ Danger to children’s play area and children playing on streets. ○ Glebe estate has existing inadequate access for emergency vehicles. ○ Endangerment of pedestrians within the town. ○ Disruption during construction phase; and difficult access / constraints for construction traffic. 	
190, 298, 420, 422, 471, 487, 505, 532, 583, 601, 622, 635, 638, 645, 661, 673, 677, 692, 716, 761, 781, 825, 830, 894, 908, 927	<ul style="list-style-type: none"> ● There is a lack of public transport (which will lead to greater use of private cars to access employment, schools, services and facilities): <ul style="list-style-type: none"> ○ Development should be on sites with good public transport links to limit the use of cars. ○ Development should be on sites where walking and cycling are realistic alternatives, to limit the use of cars. ○ This development will prioritise cars over bikes and cyclists, due to lack of cycling and walking infrastructure adjacent to the site. 	
Policy wording modifications:		
87, 526	<ul style="list-style-type: none"> ● Vehicular site access should be via the Tetbury Road. 	Local Sites Allocation Policy PS05 requires a masterplan, to be approved by the District Council, which will detail the way in which land uses and infrastructure for that site will be developed in an integrated and co-ordinated way. PS05a is not a proposed site allocation. Paragraph 3.1.10 explains that the Council has identified site PS05a as suitable for safeguarding to meet Minchinhampton’s potential future needs, should additional greenfield land
526, 781, 827	<ul style="list-style-type: none"> ● Vehicular site access should be directly from Cirencester Road (create new access road). 	



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
		<p>be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific access and layout requirements.</p> <p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
Our Environment and Surroundings		
Natural environment		
268, 298, 422, 471, 505, 532, 583, 635, 638, 645, 677, 716, 750, 825, 894, 908	<ul style="list-style-type: none"> • Loss of grazing land <ul style="list-style-type: none"> ○ Loss of run-back land / winter grazing will impact on the management of Rodborough Common SAC and Minchinhampton Common; ○ Habitats Regulation Assessment of Stroud Local Plan (HRA) dated 23 May 2021 has failed to consider the effect of the loss of run-back land on the ability to manage Rodborough Common SAC. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton’s potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific requirements, potentially including mitigation measures, strategic landscaping, green infrastructure and biodiversity net gain requirements.</p>
471, 487, 505, 716, 894, 908	<ul style="list-style-type: none"> • Potential harm or adverse impact on the nearby SSSI; <ul style="list-style-type: none"> ○ Likely harmful impacts on the ecology of Minchinhampton and Rodborough Commons (including the endangerment of grazing animals, which are vital to their maintenance and management); ○ Negative impact on wildlife and biodiversity on site and wider surroundings. 	<p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape sensitivity, flood risk and biodiversity impacts.</p>
622, 830	<ul style="list-style-type: none"> • Excessive people and vehicles will cause air pollution 	
935	<ul style="list-style-type: none"> • Potential impact on flood risk of lower-lying areas, such as Brimscombe. 	<p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p>
Landscape		



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
298	<ul style="list-style-type: none"> This is one of the last farms in the town. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton's potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific strategic landscaping and green infrastructure requirements.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape sensitivity and AONB impacts.</p>
392, 505, 532, 583, 619, 623, 635, 638, 645, 673, 677, 750, 761, 825, 894, 927, 935	<ul style="list-style-type: none"> Development of the site would conflict with / undermine the Stroud Landscape Project. 	
497, 532, 583, 619, 623, 638, 645, 673, 676, 677, 716, 825, 831, 853, 927	<ul style="list-style-type: none"> Adverse visual impacts (on the Cotswolds AONB) 	
Historic environment		
487, 532, 583, 619, 622, 623, 638, 645, 677, 716, 825, 853, 894, 908	<ul style="list-style-type: none"> Potential harm or adverse impact on the adjacent Scheduled Ancient Monument (SAM), The Bulwarks (not mitigatable through design, layout and detail). <ul style="list-style-type: none"> Archaeological survey should have been done in advance. 	<p>The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton's potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review, alongside evolution of a development strategy and further scrutiny of potential impacts. Should the site be progressed towards allocation, the next Local Plan Review will involve the identification of site-specific strategic landscaping, design and layout requirements.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including AONB impacts, heritage sensitivity and landscape sensitivity.</p>
716	<ul style="list-style-type: none"> Potential harm or adverse impact on the character and appearance of the Minchinhampton conservation area and the special interest of listed buildings (not mitigatable through design, layout and detail). 	
190, 471, 829, 853	<ul style="list-style-type: none"> Potential physical damage to historic buildings, due to additional traffic manoeuvring (and construction traffic) <ul style="list-style-type: none"> Historic interest / conservation area / heritage designations in the town will limit the ability to improve traffic flow and mitigate the additional congestion and traffic impacts generated by 	



Site Reference: Safeguarded Land: PS05a East of Tobacconist Road, Minchinhampton		
	additional development.	
Policy wording modifications: None		
Delivery and Monitoring		
214	<ul style="list-style-type: none"> Recommended for consideration in the next Review of the Stroud District Local Plan. 	Comment noted
534	<ul style="list-style-type: none"> Should PS05 and PS05a be approved in due course, a process for their gradual implementation at a rate compatible with past development rates should be agreed between the District and Parish Councils, developers and local groups working in consort, to ensure that the community benefits of such growth are realised. 	Comment noted
716	<ul style="list-style-type: none"> PS05a cannot stand alone without PS05. If PS05 were to be adopted, this site would inevitably follow. This would add considerably to all the problems highlighted in respect of PS05. 	The Council considers Local Site Allocation PS05a suitable for safeguarding to meet Minchinhampton's potential future needs, should it be required at the next local Plan review (subject to evidence of local housing need at that time and the site performing best against reasonable alternatives). The land has been assessed in landscape terms as the most appropriate location for future housing growth, should further greenfield land be required. The principle of development will be considered at the next Local Plan review.
190, 201, 298, 392, 420, 422, 471, 487, 505, 532, 583, 601, 606, 608, 619, 622, 623, 635, 638, 645, 668, 669, 673, 676, 677, 692, 716, 750, 761, 781, 825, 831, 908, 927, 935	<ul style="list-style-type: none"> Ignores or conflicts with the adopted Minchinhampton Neighbourhood Development Plan (NDP). 	Topic Paper: Neighbourhood Planning October 2021 (EB5) explains the relationship between current adopted NDPs and the emerging Local Plan. Stroud District Council has assessed all made and emerging plans for any potential Strategic Policy conflict. Any future development of the site would be required to address relevant NDP policies through masterplanning and at planning application stage.
Policy wording modifications: None		





Site Reference: Local Sites Allocation Policy PS06 The New Lawn, Nailsworth			
Number of representations: 12		Support: 5	Object: 6
Stakeholders		Comments	Stroud District Council Response
Support			
Sports England (133)	<ul style="list-style-type: none"> The new stadium should be operational prior to the redevelopment of this site. 	The redevelopment of The New Lawn is subject to the satisfactory relocation of the football club, as identified in the policy wording.	
	Policy wording modifications: None		
Object			
CPRE Gloucestershire (847)	<ul style="list-style-type: none"> Object to density rather than principle. There has been a failure to address access issues in any sufficient detail, lack of any affordable housing or local connection requirement, and the resulting non-compliance with existing and proposed SDC policy. 	Core Policy CP8 New housing development sets out requirements for good design to ensure development is appropriate in townscape, local environment, character and amenity terms.	
	<ul style="list-style-type: none"> Issues to address include ensuring existing community and sporting uses are partly retained or replaced elsewhere, enhancing local biodiversity, the improvement of road access, in particular along Tinkley Lane and in Nailsworth town centre, improved cycle parking and access, and enhancing the landscape on this AONB edge of Nailsworth. 	Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.	
	<ul style="list-style-type: none"> Relocating community and sporting uses are identified in the policy wording as a particular issue to address alongside enhancing biodiversity. On-site specifics, including site access to be agreed at the planning application stage with Gloucestershire Highways. 	Relocating community and sporting uses are identified in the policy wording as a particular issue to address alongside enhancing biodiversity. On-site specifics, including site access to be agreed at the planning application stage with Gloucestershire Highways.	
	Policy wording modifications:		
<ul style="list-style-type: none"> Amend wording to “Land at The New Lawn, as identified on the policies map, is allocated for a development comprising approximately 30 dwellings and associated community and open space uses, together with enabling infrastructure, including provision of affordable housing for those with a local connection. Particular issues to address include ensuring existing community and sporting uses are partly retained or replaced elsewhere, enhancing 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.		



Site Reference: Local Sites Allocation Policy PS06 The New Lawn, Nailsworth		
	<p>local biodiversity, the improvement of road access, in particular along Tinkley Lane and in Nailsworth town centre, improved cycle parking and access, and enhancing the landscape on this AONB edge of Nailsworth. A masterplan to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner”</p>	
Woodland Trust (404)	<ul style="list-style-type: none"> Additional protection should be given to the adjacent ancient woodland. 	Delivery Policy ES8 states that development will not be permitted that would result in the unacceptable loss of, or damage to, or threaten the continued well-being of locally valued and/or protected trees, hedgerows, community orchards, veteran trees or woodland.
	<ul style="list-style-type: none"> A minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance. 	
Policy wording modifications: None		
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> GWT is neutral on this allocation. Measures are included to avoid adverse impacts on the Local Wildlife Sites. A detailed ecological appraisal will be required. 	Comment noted
	<ul style="list-style-type: none"> Land along the southern boundary of the site is within a high priority zone for restoration in the Nature Recovery Network. 	The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.
	<ul style="list-style-type: none"> The provision of new amenity green space should be considered to avoid negative impacts on the Wildlife Sites from additional recreation pressure. 	
	<ul style="list-style-type: none"> A substantial buffer of strategic GI should be situated along the southern boundary, including a mosaic of woodland and species-rich grassland habitats. 	On-site specifics; including strategic landscaping to provide accessible open space, minimise landscape impacts and safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.
Policy wording modifications: None		



Site Reference: Local Sites Allocation Policy PS06 The New Lawn, Nailsworth		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		
192	<ul style="list-style-type: none"> Too many houses. There will not be anywhere near as many 'affordable homes' as will be promised. 	Outside the AONB and designated rural parishes, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
894	<ul style="list-style-type: none"> The site is not at an appropriate density acceptable to the local townscape 	Core Policy CP8 New housing development sets out requirements for good design to ensure development is appropriate in townscape, local environment, character and amenity terms.
Settlement hierarchy and place making		
No comments received		
Infrastructure and developer contributions		
No comments received		
Policy wording modifications:		
894	<ul style="list-style-type: none"> Amend wording to "Land at The New Lawn, as identified on the policies map, is allocated for a development comprising approximately 30 dwellings and associated community and open space uses, together with enabling infrastructure, including provision of affordable housing for those with a local connection. Particular issues to address include ensuring existing community and sporting uses are partly retained or replaced elsewhere, enhancing local biodiversity, the improvement of road access, 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.



Site Reference: Local Sites Allocation Policy PS06 The New Lawn, Nailsworth		
	<p>in particular along Tinkley Lane and in Nailsworth town centre, improved cycle parking and access, and enhancing the landscape on this AONB edge of Nailsworth. A masterplan to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner”</p>	
Homes and Communities		
Housing		
894	<ul style="list-style-type: none"> SDC has not considered the tenure, size and type of affordable units on a site by site basis for this allocation 	Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
Community facilities		
788	<ul style="list-style-type: none"> Must be conditional on replacement sports facilities in District 	The redevelopment of The New Lawn is subject to the satisfactory relocation of the football club, as identified in the policy wording.
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
No comments received		
Retail and town centres		
No comments received		
Travel, transport and highways		
894	<ul style="list-style-type: none"> The site does not prioritise use of public transport and, in particular the use of bicycles. 	Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.
894	<ul style="list-style-type: none"> The site will increase congestion within Nailsworth and along Tinkley road. 	The Sustainability Appraisal includes assessment of all sites and reasonable alternatives against SA 10: To ensure that air quality continues to improve and SA11: To maintain and enhance the quality of ground and surface waters and to achieve sustainable water resources management in the District, SA Report



Site Reference: Local Sites Allocation Policy PS06 The New Lawn, Nailsworth		
		<p>Appendix 3 - 9 (CD3b).</p> <p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p>
Infrastructure		
No comments received		
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
No comments received		
Landscape		
No comments received		
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		





Site Reference: Local Sites Allocation Policy PS10 Cheapside, Stroud		
Number of representations: 9	Support: 5	Object: 3
Comment: 1		
Stakeholders	Comments	Stroud District Council Response
Support		
No comments received	Policy wording modifications: None	
Object		
No comments received	Policy wording modifications: None	
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> GWT is neutral on this allocation. It is adjacent to the Stroudwater Canal Local Wildlife Site, which is cited for its structural diversity and significant botanical and animal interest. This location provides a foraging area for bats and a corridor for Eurasian otters. 	Comment noted
	<ul style="list-style-type: none"> Key ecological and biodiversity issues include; waste water, maintaining a substantial buffer of natural habitat between the canal and the development and minimising outside and street lighting along the southern boundary. 	Comment noted
	Policy wording modifications:	
	<ul style="list-style-type: none"> GWT is disappointed that the presence of the LWS is not recognised in the plan despite it being highlighted during the housing options consultation. 	The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network.
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		



Site Reference: Local Sites Allocation Policy PS10 Cheapside, Stroud		
788	<ul style="list-style-type: none"> This should be regarded as a key regeneration site and the policy needs a clear timeline for achieving positive redevelopment. The policy should also reference use of compulsory purchase powers in event the development cannot be achieved by landowner agreement. The public interest in regenerating this site should be put above the competing interests of the various owners. 	Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
365	<ul style="list-style-type: none"> Good to see policy from the Stroud Town NDP reflected in the local plan 	Comment noted
192	<ul style="list-style-type: none"> Too many houses and there will not be anywhere near as many 'affordable homes' as will be promised. 	<p>The Council considers the proposed allocation to be of appropriate scale and size for this Tier 1 settlement.</p> <p>Outside the AONB and designated rural parishes, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.</p>
Settlement hierarchy and place making		
No comments received		
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
No comments received		
Community facilities		
No comments received		



Site Reference: Local Sites Allocation Policy PS10 Cheapside, Stroud		
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
No comments received		
Retail and town centres		
No comments received		
Travel, transport and highways		
214	<ul style="list-style-type: none"> This site should only be included subject to no loss of car spaces. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation.
214	<ul style="list-style-type: none"> Should provide safe pedestrian access running from South in Rodborough to the town centre in the North. 	On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.
365	<ul style="list-style-type: none"> The allocation should include a link to the town centre via a new railway bridge to improve disabled access 	
Infrastructure		
No comments received		
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
No comments received		
Landscape		
No comments received		
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		



Site Reference: Local Sites Allocation Policy PS10 Cheapside, Stroud		
No comments received		
Policy wording modifications: None		





Site Reference: Local Sites Allocation Policy PS11 Merrywalks Arches, Stroud		
Number of representations: 9	Support: 6	Object: 2
Stakeholders	Comments	Stroud District Council Response
Support		
No comments received	Policy wording modifications: None	
Object		
No comments received	Policy wording modifications: None	
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> GWT is neutral on this allocation. 	Comment noted
	<ul style="list-style-type: none"> No significant initial concerns regarding the impact of this allocation on biodiversity and ecological networks but a full ecological appraisal should be undertaken. 	The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network.
	Policy wording modifications: None	
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		
788	<ul style="list-style-type: none"> This should be regarded as a key regeneration site and the policy needs a clear timeline for achieving positive redevelopment. 	Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
788	<ul style="list-style-type: none"> The policy should also reference use of compulsory purchase powers in event the development cannot be achieved by landowner agreement. The public interest in regenerating this site should be put above the competing interests of the various owners. 	



Site Reference: Local Sites Allocation Policy PS11 Merrywalks Arches, Stroud		
192	<ul style="list-style-type: none"> Too many houses and there will not be anywhere near as many 'affordable homes' as will be promised. 	<p>The Council considers the proposed allocation to be of appropriate scale and size for this Tier 1 settlement.</p> <p>Outside the AONB and designated rural parishes, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.</p>
Settlement hierarchy and place making		
No comments received		
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
No comments received		
Community facilities		
No comments received		
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
No comments received		
Retail and town centres		
No comments received		
Travel, transport and highways		



Site Reference: Local Sites Allocation Policy PS11 Merrywalks Arches, Stroud		
365	<ul style="list-style-type: none"> Development on this site requires a pedestrian connection to the town centre, via Rowcroft, as well as onto Merrywalks. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation.
365	<ul style="list-style-type: none"> Negotiating a right of way (or equivalent) should be a pre-condition 	On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.
Infrastructure		
No comments received		
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
No comments received		
Landscape		
No comments received		
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		



PS12

Site Reference: Local Sites Allocation Policy PS12 Police Station/Magistrate's Court, Stroud		
Number of representations: 10	Support: 7	Object: 2
Stakeholders	Comments	Stroud District Council Response
Support		
No comments received	Policy wording modifications: None	
Object		
No comments received	Policy wording modifications: None	
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> GWT is neutral on this allocation. 	Comment noted
	<ul style="list-style-type: none"> No significant initial concerns regarding the impact of this allocation on biodiversity and ecological networks but a full ecological appraisal should be undertaken. 	The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network.
	Policy wording modifications: None	
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		
365	<ul style="list-style-type: none"> Agree with this proposal 	Comment noted
192	<ul style="list-style-type: none"> Too many houses and there will not be anywhere near as many 'affordable homes' as will be promised. 	<p>The Council considers the proposed allocation to be of appropriate scale and size for this Tier 1 settlement.</p> <p>Outside the AONB and designated rural parishes, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local</p>



Site Reference: Local Sites Allocation Policy PS12 Police Station/Magistrate's Court, Stroud		
		Plan addresses specific housing needs, including affordable housing.
788	<ul style="list-style-type: none"> This should be regarded as a key regeneration site and the policy needs a clear timeline for achieving positive redevelopment. 	Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
788	<ul style="list-style-type: none"> The policy should also reference use of compulsory purchase powers in event the development cannot be achieved by landowner agreement. The public interest in regenerating this site should be put above the competing interests of the various owners. 	
Settlement hierarchy and place making		
No comments received		
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
No comments received		
Community facilities		
No comments received		
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
No comments received		
Retail and town centres		
214	<ul style="list-style-type: none"> This allocation should take advantage of the existing footprint rather than demolition and rebuild. 	Core Policy CP8 New housing development sets out requirements for good design to ensure development is appropriate in townscape, local environment, character and amenity terms.



Site Reference: Local Sites Allocation Policy PS12 Police Station/Magistrate’s Court, Stroud		
Travel, transport and highways		
No comments received		
Infrastructure		
No comments received		
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
No comments received		
Landscape		
No comments received		
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		



STR065

Site Reference: Local Sites Allocation Policy STR065 Land at Beeches Green, Stroud			
Number of representations: 9		Support: 6	
Stakeholders		Comments	
		Stroud District Council Response	
Support			
No comments received		Policy wording modifications: None	
Object			
No comments received		Policy wording modifications: None	
Comment			
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> GWT is neutral on this allocation. No significant initial concerns regarding the impact of this allocation on biodiversity and ecological networks but a full ecological appraisal should be undertaken. 		<p>Comment noted</p> <p>The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network.</p>
	Policy wording modifications: None		
Other representations		Issues raised	
		Stroud District Council Response	
Development Strategy			
Delivering carbon neutral			
No comments received			
Strategic growth and development locations			
192	<ul style="list-style-type: none"> Too many houses and there will not be anywhere near as many 'affordable homes' as will be promised. 		<p>The Council considers the proposed allocation to be of appropriate scale and size for this Tier 1 settlement.</p> <p>Outside the AONB and designated rural parishes, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.</p>



Site Reference: Local Sites Allocation Policy STR065 Land at Beeches Green, Stroud		
788	<ul style="list-style-type: none"> This should be regarded as a key regeneration site and the policy needs a clear timeline for achieving positive redevelopment. 	Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
788	<ul style="list-style-type: none"> The policy should also reference use of compulsory purchase powers in event the development cannot be achieved by landowner agreement. The public interest in regenerating this site should be put above the competing interests of the various owners. 	
788	<ul style="list-style-type: none"> The site should be considered in conjunction with all land included in the Stroud NDP 	
Settlement hierarchy and place making		
365	<ul style="list-style-type: none"> The site should be extended to include the large car park behind the building. Development would then be in a better position to design something more varied and integrated with surroundings, including contribution to the proposed route from the town centre to Stratford Park in the NDP 	Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
No comments received		
Community facilities		
No comments received		
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
No comments		



Site Reference: Local Sites Allocation Policy STR065 Land at Beeches Green, Stroud		
received		
Retail and town centres		
No comments received		
Travel, transport and highways		
788	<ul style="list-style-type: none"> Include new pedestrian access to Stratford Park/ Tesco. 	<p>Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation.</p> <p>On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.</p>
214	<ul style="list-style-type: none"> Support is conditional upon a Master Plan showing the ability to provide links to the town centre for pedestrians and equally to the west approaching Tesco and Gannicox. 	<p>Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation.</p> <p>On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.</p>
Infrastructure		
No comments received		
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
No comments received		
Landscape		
No comments received		
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		



PS16

Site Reference: Local Sites Allocation Policy PS16 South of Leonard Stanley Primary School		
Number of representations: 13	Support: 7	Object: 4
Stakeholders	Comments	Stroud District Council Response
Support		
Sport England (133)	<ul style="list-style-type: none"> Support the allocation but raise the issue of possible of ball strike from the playing fields onto the new residential development or the creation of planning blight on the play fields due to the impact through residential amenity via the sports use. 	Comment noted
Policy wording modifications: None		
McLoughlin Planning for Gloucestershire County Asset Management Property Services (AMPS) (849) Site promoter	<ul style="list-style-type: none"> Support the allocation and that is available, achievable and deliverable. 	Comment noted
Policy wording modifications: None		
Object		
No comments received		
Policy wording modifications: None		
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> No significant initial concerns subject to a full ecological appraisal. 	Comment noted
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		



Site Reference: Local Sites Allocation Policy PS16 South of Leonard Stanley Primary School		
No comments received		
Settlement hierarchy and place making		
No comments received		
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
192	<ul style="list-style-type: none"> Too many houses and won't deliver the amount of 'affordable homes' promised. 	Outside the AONB and designated rural parishes, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
832	<ul style="list-style-type: none"> The strip of land is narrow. They will overlook the existing bungalows and should be single storey. 	Core Policy CP8 New housing development sets out requirements for good design to ensure development is appropriate in townscape, local environment, character and amenity terms.
Community facilities		
No comments received		
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
No comments received		
Retail and town centres		
No comments received		
Travel, transport and highways		



Site Reference: Local Sites Allocation Policy PS16 South of Leonard Stanley Primary School		
No comments received		
Infrastructure		
No comments received		
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
709	<ul style="list-style-type: none"> Do not allow any hard non-porous standing, parking areas for vehicles, including private drives. 	Comment noted
832	<ul style="list-style-type: none"> The current runoff/drainage system doesn't work, green spaces are saturated and overflow. 	All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP (EB69).
Landscape		
No comments received		
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		



PS42

Site Reference: Local Sites Allocation Policy PS42 Land off Dozule Close, Leonard Stanley		
Number of representations: 11	Support: 5	Object: 5
Comment: 1		
Stakeholders	Comments	Stroud District Council Response
Support		
No comments received	Policy wording modifications: None	
Object		
No comments received	Policy wording modifications: None	
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> No significant initial concerns subject to a full ecological appraisal 	Comment noted
	Policy wording modifications: None	
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		
192	<ul style="list-style-type: none"> Too many houses and won't deliver the amount of 'affordable homes' promised. 	Outside the AONB and designated rural parishes, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
Settlement hierarchy and place making		
No comments received		
Infrastructure and developer contributions		
No comments received		



Site Reference: Local Sites Allocation Policy PS42 Land off Dozule Close, Leonard Stanley		
Policy wording modifications: None		
Homes and Communities		
Housing		
832	<ul style="list-style-type: none"> The strip of land for building behind the bungalows is narrow. They will overlook the existing bungalows and should be single storey. 	Core Policy CP8 New housing development sets out requirements for good design to ensure development is appropriate in townscape, local environment, character and amenity terms.
Community facilities		
No comments received		
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
No comments received		
Retail and town centres		
No comments received		
Travel, transport and highways		
No comments received		
Infrastructure		
No comments received		
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
709	<ul style="list-style-type: none"> Do not allow any hard non-porous standing, parking areas for vehicles, including private drives. 	Comment noted
832	<ul style="list-style-type: none"> The current runoff/drainage system doesn't work, green spaces are saturated and overflow onto the roads and driveways. 	All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP (EB69).
Landscape		



Site Reference: Local Sites Allocation Policy PS42 Land off Dozule Close, Leonard Stanley		
No comments received		
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		



PS17

Site Reference: Local Sites Allocation Policy PS17 Magpies site, Oldends Lane, Stonehouse				
Number of representations: 13		Support: 6	Object: 6	Comment: 1
Stakeholders	Comments		Stroud District Council Response	
Support				
Stonehouse Town Council (503) Site promoter	<ul style="list-style-type: none"> Development will enable the Town Council to deliver an improved and extended community hall with social facilities. 		Comment noted	
	<ul style="list-style-type: none"> No case for the safeguarding of land within the site for a pedestrian bridge due to the lack of available land on both sides of the rail track to accommodate the size of bridge required and a lack of funding. 		<p>The site shall also safeguard land to allow for a future pedestrian bridge across the railway at Oldends Lane. A masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.</p> <p>Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.</p>	
	<ul style="list-style-type: none"> Adopted Local Plan allocation SA2: West of Stonehouse and planning permission S.18/0982/FUL for residential development west of the rail track do not include any safeguarded land for a footbridge. 		Comment noted	
	<ul style="list-style-type: none"> Provision for pedestrians and cyclists should be made at the Oldends Lane level crossing. 		<p>The site lies adjacent to the Bristol-Birmingham main railway line and future plans for a pedestrian bridge across the railway line for pedestrians and cyclists will require land on this site to be safeguarded for these purposes.</p> <p>On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways and Network Rail.</p>	
	<ul style="list-style-type: none"> Safeguarding land within the site for a future pedestrian bridge may prejudice the viability of the allocation. 		<p>The Council's Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p>	
	Policy wording modifications:			
<ul style="list-style-type: none"> Remove the reference to safeguarding land for a footbridge by deleting the sentence: "The site shall also safeguard land to allow for a future pedestrian 		All suggested policy wording modifications will be considered by the Inspectors at the EIP.		



Site Reference: Local Sites Allocation Policy PS17 Magpies site, Oldends Lane, Stonehouse		
	bridge across the railway at Oldends Lane.”	
Object		
Sport England (133)	<ul style="list-style-type: none"> Detrimental impact on the playing fields and stadium from the potential loss of ancillary facilities. 	Comment noted
	<ul style="list-style-type: none"> Highlight potential impact on residential amenity from ball strike, sports lighting and possible creation of a 3G Artificial Grass pitch on the adjacent sports fields. 	Comment noted
Policy wording modifications: None		
Eastington Parish Council (332)	<ul style="list-style-type: none"> A good, uninterrupted sustainable travel route is required linking Great Oldbury and proposed extension PS19a Stonehouse North West with Stonehouse. 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>On-site specifics, including pedestrian, cycle and vehicular site access, highway safety are to be addressed at the masterplan / planning application stage, in agreement with Gloucestershire Highways. Delivery Policy E112 requires development proposals that are likely to have a significant impact on the local transport network to submit a Transport Assessment, as well as a Travel Plan.</p>
	<ul style="list-style-type: none"> No indication of footbridge site west of the railway line. 	The site shall also safeguard land to allow for a future pedestrian bridge across the railway at Oldends Lane. A masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.
	<ul style="list-style-type: none"> The footbridge should be completed and adopted prior to the commencement of strategic allocation sites PS19a Stonehouse North West and PS20 Eco Park M5 Junction 13. 	<p>The site shall also safeguard land to allow for a future pedestrian bridge across the railway at Oldends Lane. A masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.</p> <p>The Council’s Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence</p>



Site Reference: Local Sites Allocation Policy PS17 Magpies site, Oldends Lane, Stonehouse		
		base and documentation. This will be published in due course.
Policy wording modifications: None		
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> No significant initial concerns regarding the impact of this allocation on biodiversity and ecological networks subject to a full ecological appraisal. 	Comment noted
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		
192	<ul style="list-style-type: none"> Too many houses overall and doubts over affordable housing delivery. 	<p>The Council considers the proposed allocation to be of appropriate scale and size for this Tier 1a settlement. Justification for the role of Stonehouse in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).</p> <p>Outside the AONB and designated rural parishes, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.</p>
Settlement hierarchy and place making		
No comments received		
Infrastructure and developer contributions		
No comments received		

Site Reference: Local Sites Allocation Policy PS17 Magpies site, Oldends Lane, Stonehouse		
Policy wording modifications: None		
Homes and Communities		
Housing		
No comments received		
Community facilities		
No comments received		
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
No comments received		
Retail and town centres		
No comments received		
Travel, transport and highways		
No comments received		
Infrastructure		
No comments received		
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
709	<ul style="list-style-type: none"> Do not allow any hard non porous standing, parking areas for vehicles, including private drives. 	Comment noted
Landscape		
No comments received		
Historic environment		
No comments		



Site Reference: Local Sites Allocation Policy PS17 Magpies site, Oldends Lane, Stonehouse		
received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		



PS19a

Site Reference: Strategic Sites Allocation Policy PS19a Stonehouse North West				
Number of representations: 24		Support: 11	Object: 11	Comment: 2
Stakeholders	Comments		Stroud District Council Response	
Support				
Sport England (133)	<ul style="list-style-type: none"> Sport England (SE) supports the Strategic Site Allocation Policy PS19a (Stonehouse North West), and would advise applying SE active design principles 		Comment noted	
Policy wording modifications: None				
Pegasus Group for Robert Hitchins Ltd (879)	<ul style="list-style-type: none"> Unnecessary requirement in the policy for a development brief and indicative masterplan to be approved by the Council 		The Council considers that the indicative masterplan approach will ensure that development addresses the site allocation policy requirements for high quality sustainable development in this location in an integrated and co-ordinated manner.	
	<ul style="list-style-type: none"> It appears that the need for 8 additional plots is proposed to be met on PS19a only. None of the other strategic sites are required to make any provision for travelling showpeople. There is no justification for any, let alone the entire district provision to be met at Stonehouse North West. 		8 plots for travelling showpeople are required to reflect the need identified in the Gypsy and Traveller Accommodation Assessment EB11.	
	<ul style="list-style-type: none"> In terms of contributions towards secondary and further education, there is currently no evidence that there is a need for additional places and so similarly this policy requirement is not justified. 		Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.	
	<ul style="list-style-type: none"> A surgery is normally commercially funded and is viable without the need for contributions. 		Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.	
	<ul style="list-style-type: none"> It would be better to combine those aspects of policy where contributions might be required to mitigate into a single criterion worded along the lines of “the development will provide for necessary works and appropriate contributions to mitigate its impact on education, social and community infrastructure, and the transport network”. 		Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.	
	<ul style="list-style-type: none"> The wording of the policy as currently written is not considered appropriate as it implies that on site 		Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.	



Site Reference: Strategic Sites Allocation Policy PS19a Stonehouse North West		
	<p>mitigation is required which would be unrealistic to deliver.</p> <ul style="list-style-type: none"> At this stage the IDP is not clear on what is required and can be justified to support the development of Stonehouse North West. An objection is made criterion 20 as it is unnecessary. The site is well located in respect of existing and proposed employment opportunities/land in the vicinity of the site and to link housing completions to the bringing forward of a specific employment site unnecessarily risks housing delivery. 	<p>Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.</p> <p>The Council do not agree with this statement and consider criterion 20 to be justified.</p>
Policy wording modifications: None		
Stagecoach West (952)	<ul style="list-style-type: none"> Stagecoach is able to strongly support this allocation which it believes to be in conformity with NPPF, to be effective in strongly supporting the delivery of the Strategic Objectives and the Key Priorities of the plan and to be appropriately and properly evidenced sufficient to justify allocation. 	Comment noted
Policy wording modifications: None		
SF Planning Ltd for Gloucestershire County Council Asset Management and Property Services (882) Site Promoter	<ul style="list-style-type: none"> This representation confirms that the eastern part of the land illustrated in Appendix A submitted by GCC AMPS to the Strategic Assessment of Land Availability (SALA) known as site ref. STO016 is suitable, available, and achievable; and as such is deliverable in the timescale envisaged by the Local Plan Review. 	Comment noted
Policy wording modifications: None		
Standish Parish Council (301)	<ul style="list-style-type: none"> The conditions set out in the draft Standish Neighbourhood Development Plan must be adhered to in every aspect of the PS19a development. 	<p>Topic Paper: Neighbourhood Planning October 2021 (EB5) explains the relationship between current adopted NDPs and the emerging Local Plan.</p> <p>Where a neighbourhood plan precedes an emerging local plan, it should be prepared with consideration to the emerging local plan evidence base and draft policies. The neighbourhood plan will need to be in general conformity</p>



Site Reference: Strategic Sites Allocation Policy PS19a Stonehouse North West		
		with strategic local polices and in any conflicting policies, the later plan will carry more weight.
Policy wording modifications: None		
Stonehouse Town Council (503)	<ul style="list-style-type: none"> Stonehouse Town Council support the site allocation but do not support the multi-modal transport hub approach required at point 12 of Strategic Site Allocation Policy PS20. 	Topic Paper – Transport October 2021 (EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices.
Policy wording modifications: None		
Object		
National Trust (304)	<ul style="list-style-type: none"> Proposed development of 650 houses would extend Stonehouse northwards and impact on the views and setting of the AONB, including the views from Haresfield Beacon and the Topograph viewpoint. 	<p>The Council considers PS19a suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>To integrate the development with Great Oldbury and to protect the landscape setting of Standish, open countryside and views from the AONB escarpment, substantial structural landscaping will provide a green buffer on the western, northern and eastern edges of the development and green infrastructure within the development will link where possible with existing green infrastructure at Great Oldbury to create sustainable green corridors.</p>
Policy wording modifications: None		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> GWT does not believe that the allocation as it currently stands is sound due to unmitigated adverse impacts on the River Frome Local Wildlife Site, which means it is not compliant with Strategic Policy S06 or NPPF 174a &b. Evidence has not been presented to demonstrate that the proposed provision of strategic GI will be sufficient to avoid increased recreational impacts on the Severn Estuary SPA, SAC and RAMSAR sites 	On-site specifics; including strategic landscaping to provide accessible open space, minimise landscape impacts and safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.
Policy wording modifications: None		



Site Reference: Strategic Sites Allocation Policy PS19a Stonehouse North West		
Eastington Parish Council (332)	<ul style="list-style-type: none"> A broad shallow bridge over the railway needs to be specified and allocated on the west of the railway to link to PS19a (where the eastern half of a bridge is mentioned)– The site PS19a should be restricted until such a bridge is secured and an area allocated in this plan. Otherwise the route on narrow pavements and with constant railway crossing delays will inhibit sustainable travel to Senior Schools, rail travel and Stonehouse town centre. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
Policy wording modifications: None		
Comment		
CPRE Gloucestershire (847)	<ul style="list-style-type: none"> All large developments in the Stonehouse area are unsustainable without national infrastructure improvements to trunk roads, M5 and the rail network. These are out of the control of SDC 	Comment noted
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		
No comments received		
Settlement hierarchy and place making		
214	<ul style="list-style-type: none"> It is important that this major allocation is designed to complement the Great Oldbury allocation (previously known as west of Stonehouse). In particular connectivity for vehicles, bikes, pedestrians should be integral to this area and of course Great Oldbury. Connectivity with employment provision is 	Comment noted



Site Reference: Strategic Sites Allocation Policy PS19a Stonehouse North West		
	essential.	
192, 621, 338	<ul style="list-style-type: none"> Too many houses for the area and won't be enough affordable housing. 	<p>The Council considers the proposed allocation to be of appropriate scale and size for this Tier 1 settlement. Justification for the role of Stonehouse in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).</p> <p>Outside the AONB and designate rural parishes, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings.</p>
489	<ul style="list-style-type: none"> Site and size suitable for settlement based on good transport, employment and infrastructure. 	Comment noted
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
No comments received		
Community facilities		
No comments received		
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
No comments received		
Retail and town centres		
621	<ul style="list-style-type: none"> Not enough shops to support development 	Core Policy CP8 New housing development sets out requirements for good design to ensure development is appropriate in townscape, local



Site Reference: Strategic Sites Allocation Policy PS19a Stonehouse North West		
		environment, character and amenity terms.
Travel, transport and highways		
365	<ul style="list-style-type: none"> Not close enough to existing infrastructure and will be too reliant on road network 	Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities
894	<ul style="list-style-type: none"> All large developments in the Stonehouse area are unsustainable without national infrastructure improvements to trunk roads, M5 and the rail network. These are out of the control of SDC 	Comment noted
Infrastructure		
No comments received		
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
No comments received		
Landscape		
No comments received		
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		



PS20

Site Reference: Strategic Site Allocation Policy PS20 Eco Park M5 Junction 13			
Number of representations: 25		Support: 11	
Stakeholders		Comments	
		Stroud District Council Response	
Support			
Ridge and Partners for Ecotricity (896) Site promoter	<ul style="list-style-type: none"> Support the Pre-Submission Draft Plan and the allocation of the site for mixed use 	Comment noted	
	<ul style="list-style-type: none"> PS20 includes a number of criteria to ensure that sustainable transport enhancements are prioritised above the provision of additional highway capacity. 	Comment noted	
	<ul style="list-style-type: none"> There are concerns with the transport modelling that has been provided to inform the evidence base, and it not being fully aligned with the aspirations of the Local Plan Review in terms of modal shift, as well as the Stroud Sustainable Transport Strategy. The traffic modelling applies a 15% Modal Shift, which is considered a low modal shift against the aspirations the Plan and Sustainable Transport Strategy. 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, modal shift, prioritising active travel measures and improvement of public transport opportunities.</p> <p>The council has produced an Infrastructure Delivery Plan (IDP) to support future development. (EB69). Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.</p>	
	<ul style="list-style-type: none"> It is considered that proportional infrastructure funding provided by the Site would be better spent on sustainable modes of transport and encouraging modal shift, as opposed to unnecessary improvements to the A419 which could undermine the Stroud Sustainable Transport Strategy. 	<p>The council has produced an Infrastructure Delivery Plan (IDP) to support future development (EB69). Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.</p>	
	Policy wording modifications:		
<ul style="list-style-type: none"> Remove '70 bed care village' and replace with 'care village' to allow flexibility both in the policy and the design of the development. Criteria 1 – Remove 'to be located north of the A419' to allow flexibility on the location Criteria 2 – add 'and care village' Criteria 3 – remove as care village will be referenced in criteria 2. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.		



Site Reference: Strategic Site Allocation Policy PS20 Eco Park M5 Junction 13		
	<ul style="list-style-type: none"> Paragraph 3.2.21 – remove reference to location. Replace with ‘The sports stadium, employment, hotel, care village, and other ancillary built development will be located outside of the Industrial Heritage Conservation Area (IHCA)’ Criteria 20 – remove 	
Object		
Gloucestershire County Council (904)	<ul style="list-style-type: none"> Not considered sound. The policy and supporting text fails to reference the presence across part of the allocation of underlying sand and gravel mineral resources that are of potential economic importance. The overarching policy aim of adopted Minerals Local Plan for Gloucestershire Policy MS01 is to ensure valuable mineral resources are not needlessly sterilised by surface development. 	The Council has prepared a Statement of Common Ground with Gloucestershire County Council, which has acknowledged this objection and where “both parties are committed to working together to resolve this soundness matter and will continue dialogue accordingly.” (Duty to Cooperate Statement (EB3).
	<p>Policy wording modifications:</p> <ul style="list-style-type: none"> The ‘planning constraints and designations’ set out on page 105 should include the fact that part of the allocation falls within designated Mineral Safeguarding Areas (MSAs). In addition, the text for Strategic Site Allocation Policy PS20 should include a further bullet requiring any future development brief to...:- determine through an initial Mineral Resource Assessment (MRA), the significance of the underlying mineral resources present within the designated MSAs and the extent to which any mitigation measures will be necessary to avoid sterilisation by surface development and / or whether a strategy for the prior extraction of the mineral will be required for any future development proposals covering the relevant areas of allocation PS20. 	Further discussion with GCC required. All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Eastington Parish	<ul style="list-style-type: none"> Paragraph 2.6 table 4 indicates a need for between 	The employment land figure is a minimum requirement. The Plan (CD1)



Site Reference: Strategic Site Allocation Policy PS20 Eco Park M5 Junction 13		
Council (332)	62.4ha and 71.8ha employment land up to 2040 but with 11.5 already committed this plan needs to find between 50.9 and 60.3ha. Despite this the plan allocates 79ha.	gives significant weight on the need to support economic growth and productivity. It allocates more employment land than recommended in the Gloucestershire Economic Needs Assessment (EB29) to allow for flexibility to accommodate needs not anticipated on the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances. This conforms to the requirements within paragraph 82 of the NPPF (July 2021).
	<ul style="list-style-type: none"> Allocation of this site appears to draw investment from sequentially more sustainable sites and phasing of this site such that it only gets developed after more sustainable sites within existing communities would potentially delay other sites from being developed. 	The Plan (CD1) does not draw from more sustainable site. This site is required, in addition to other sites, that collectively support economic growth in the district.
	<ul style="list-style-type: none"> Eastington is already a net importer of employees and Stonehouse already one of the districts most important employment hubs so why is a 10ha site remote from the supportive housing communities being proposed at Junction 13 to draw investment from the 'balanced communities' (CP2) 	The NPPF (July 2021) details that planning policies and decisions should <i>"recognise and address the specific locational requirements of different sectors"</i> (paragraph 83). Large industrial/warehousing units at key locations within the A38/M5 corridor was identified as one of the six key segments of market demand in the Gloucestershire Economic Needs Assessment (EB29) for future employment land supply to satisfy. This is a strategic employment site and has been allocated to meet the needs of one of the key employment sectors.
	<ul style="list-style-type: none"> Early indications of the effects of Covid are that many people will not return to their places of work and as such significantly less volume of workplace is likely to be required. 	Covid 19 is still an ongoing situation and therefore economic data (which has a time lag) and longer term trends have yet to fully emerge. The initial implications of Covid 19 were reviewed by the consultants in the Gloucestershire Economic Needs Assessment (EB29) when establishing future needs.
Policy wording modifications: None		
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> GWT is neutral on this allocation. GWT is pleased to see that the initial site masterplan proposes a large proportion of strategic GI, specifically creating a large buffer to the River Frome and Stroudwater Canal Local Wildlife Sites. It is vital that this is retained as the site progressed and this should be made a 	Comment noted.



Site Reference: Strategic Site Allocation Policy PS20 Eco Park M5 Junction 13		
	<p>requirement of the allocation.</p> <ul style="list-style-type: none"> A full ecological appraisal is required to ensure there are no other detrimental impact on the ecological condition of either Local Wildlife sites. Land to the south of the A419 is in a priority area for wetland habitat creation and low priority area for species rich grassland habitat creation in the NRN. The GI design should reflect this rather than woodland creation. 	<p>The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.</p> <p>On-site specifics; including strategic landscaping to safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.</p>
	<ul style="list-style-type: none"> It is recommended that this allocation is required to achieve the Building with Nature Benchmark or similar standards for GI. Without this requirement GWT questions whether the proposal is sound in terms of the NPPF and the Council's strategic policy on Green Infrastructure. 	<p>Developers of strategic sites are strongly encouraged to follow Building with Nature standards.</p>
Policy wording modifications: None		
Historic England (813)	<ul style="list-style-type: none"> Page 114. Point 9. "A layout of uses, density and built form and character which ensures less than substantial harm to IHCA". This condition should be reviewed as it appears inconsistent with the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 72 that requires local planning authorities to pay special attention in the exercise of planning functions to the desirability of preserving or enhancing the character or appearance of a conservation area. 	<p>The Council considers Strategic Site Allocation PS20 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>On-site specifics; including use, density and built form and character to be addressed at the masterplan/ planning application stage.</p>
Policy wording modifications: None		
CPRE Gloucestershire (847)	<ul style="list-style-type: none"> It is essential that commitment and start dates are obtained from Network Rail before any work is started on this site. Agreement, site and completion date for a station on the Bristol railway line is 	<p>In consultation with Network Rail, the Council is currently working on a strategic outline business case for reopening of Stonehouse Bristol Road railway station. There is no justification for reopening of station prior to development commencing.</p>



Site Reference: Strategic Site Allocation Policy PS20 Eco Park M5 Junction 13		
	<p>essential.</p> <ul style="list-style-type: none"> All large developments in the Stonehouse area are unsustainable without national infrastructure improvements to trunk roads, M5 and the rail network. These are out of the control of SDC. 	<p>The council has assessed the transport infrastructure requirement for the site in the Sustainable Transport Strategy (EB60a) and the Traffic Forecasting Report (EB61).</p> <p>The council has produced an Infrastructure Delivery Plan (IDP) to support future development (EB69). Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation, including transport infrastructure. This will be published in due course.</p>
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		
489	<ul style="list-style-type: none"> The site is in a more sustainable location than Sharpness and Wisloe - it is far better related to higher order facilities and services, has much better transport links and opportunities and is very well related to current and potential housing opportunities than proposed employment development at growth points 	Comment noted
214	<ul style="list-style-type: none"> The current allocation of business space (10 hectares) seems rather modest for a site extending to 40 hectares. 	The site is strategic mixed use development, comprising 42 hectares of primarily agricultural land, delivering approximately 10 hectares of business uses associated with the green technology and low carbon sector; in addition to a sports stadium with ancillary uses comprising fitness centre, hotel and sports training pitches; a care village and open space uses.
214	<ul style="list-style-type: none"> It will be essential look at the Master Plan and the ability to deliver a viable project mindful of the twenty goals given on pages 113 and 114. 	Comment noted
338	<ul style="list-style-type: none"> The PS20 map shows uses on this part of the site 	The P20 map correctly shows the broad location of the proposed uses.



Site Reference: Strategic Site Allocation Policy PS20 Eco Park M5 Junction 13		
	which are not part of the planning permission. Presumably the care village, and multi-modal travel interchange should be on the area south of the A419.	Although not part of exiting planning permission, the allocation provides for a care village to be located adjacent to Westend/Great Oldbury and a multi modal travel interchange hub north of the A419. A new planning application has been submitted.
192	<ul style="list-style-type: none"> Too many houses. There will not be anywhere near as many 'affordable homes' as will be promised. 	Comment not relevant to this site
365	<ul style="list-style-type: none"> This location for business and leisure, poorly related to the urban area. Business and recreational activities could be integrated into, or closely linked to, town centres offering good train, bus, bike and walking accessibility. Commercial, community and leisure facilities, at higher densities, could create a mixed use centre around the possible site of a new station near Black Bridge. Residential neighbourhoods could cluster around this centre, altogether forming a twin settlement to Stonehouse, closely linked to benefit from shared facilities. 	<p>The NPPF (July 2021) details that planning policies and decisions should “recognise and address the specific locational requirements of different sectors” (paragraph 83).</p> <p>Large industrial/warehousing units at key locations within the A38/M5 corridor was identified as one of the six key segments of market demand in the Gloucestershire Economic Needs Assessment (EB29) for future employment land supply to satisfy. This is a strategic employment site, supported within the Employment Land Review (EB30), and has been allocated to meet the needs of one of the key employment sectors.</p> <p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p>
Settlement hierarchy and place making		
No comments received		
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
No comments received		
Community facilities		



Site Reference: Strategic Site Allocation Policy PS20 Eco Park M5 Junction 13		
No comments received		
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
26	<ul style="list-style-type: none"> This will provide employment and will help Stroud to support and develop new ways of building in ways which support the needs of locals and the green agenda. 	Comment noted
338	<ul style="list-style-type: none"> There is no attempt to justify employment use on this greenfield site next to M5 junction 13. 	<p>The NPPF (July 2021) details that planning policies and decisions should “recognise and address the specific locational requirements of different sectors” (paragraph 83). Large industrial/warehousing units at key locations within the A38/M5 corridor was identified as one of the six key segments of market demand in the Gloucestershire Economic Needs Assessment (EB29) for future employment land supply to satisfy.</p> <p>This is a strategic employment site and has been allocated to meet the needs of one of the key employment sectors.</p>
Retail and town centres		
No comments received		
Travel, transport and highways		
230	<ul style="list-style-type: none"> The development is inappropriate in a rural areas and will overload the local road network. 	<p>The NPPF (July 2021) details that planning policies and decisions should “recognise and address the specific locational requirements of different sectors” (paragraph 83).</p> <p>Large industrial/warehousing units at key locations within the A38/M5 corridor was identified as one of the six key segments of market demand in the Gloucestershire Economic Needs Assessment (EB29) for future employment land supply to satisfy. This is a strategic employment site, supported within the Employment Land Review (EB30), and has been allocated to meet the needs of one of the key employment sectors.</p> <p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context,</p>



Site Reference: Strategic Site Allocation Policy PS20 Eco Park M5 Junction 13		
		including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.
338	<ul style="list-style-type: none"> The location will not do much to reduce car usage, and to bolster its green credentials with shuttle buses to local stations seems inadequate. 	Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities
894	<ul style="list-style-type: none"> It is essential that commitment and start dates for a station on the Bristol railway line are obtained from Network Rail before any work is started on this site. 	In consultation with Network Rail, the Council is currently working on a strategic outline business case for reopening of Stonehouse Bristol Road railway station. There is no justification for reopening of station prior to development commencing.
894	<ul style="list-style-type: none"> Stonehouse will need a new station for the Swindon-Gloucester line as the current site is inadequate for future needs. No decision should be made on this site until the site for a new station has been agreed. 	There is no evidence that the current site is inadequate for future needs.
894	<ul style="list-style-type: none"> All large developments in the Stonehouse area are unsustainable without national infrastructure improvements to trunk roads, M5 and the rail network. These are out of the control of SDC. 	<p>The council has assessed the transport infrastructure requirement for the site in the Sustainable Transport Strategy (EB60a) and the Traffic Forecasting Report (EB61).</p> <p>The council has produced an Infrastructure Delivery Plan (IDP) to support future development. (EB69). Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation, including transport infrastructure. This will be published in due course.</p>
Infrastructure		
No comments received		
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
709	<ul style="list-style-type: none"> Do not allow any hard non-porous standing, parking areas for vehicles, including private drives. 	Comment noted
894	<ul style="list-style-type: none"> The construction of impermeable practise pitches and 	Comment noted



Site Reference: Strategic Site Allocation Policy PS20 Eco Park M5 Junction 13		
	parking areas must not be permitted as this will increase surface water run-off and the need for SuDS.	
894	<ul style="list-style-type: none"> Regarding criteria 5, there is no net gain to local biodiversity 	The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network.
894	<ul style="list-style-type: none"> No Environmental Impact Assessment has been submitted (2020/0130/EIAS) or assessed for protection of The Industrial Heritage Conservation Area and its associated wildlife. 	The Council has prepared a HRA (EB85) and SA (CD3) to assess Environmental Impact and The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.
Landscape		
No comments received		
Historic environment		
894	<ul style="list-style-type: none"> Any development destroying the site of the Roman villa must be avoided 	Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		

PS24

Site Reference: Strategic Site Allocation Policy PS24 Cam North West			
Number of representations: 109		Support: 15	Object: 86
Stakeholders		Comments	Stroud District Council Response
Support			
Blue Fox Planning Ltd for Persimmon Homes Severn Valley (928) Joint site promoter	<ul style="list-style-type: none"> We believe the development is capable of delivering 1,030 dwellings, which is more than currently proposed in PS24. 	Comment noted	
	<ul style="list-style-type: none"> EV charging technology is changing rapidly, only the ducts should be required to allow change. 	Electric vehicle charging points in accordance with local parking standards are required and viable.	
	<ul style="list-style-type: none"> The policies map of PS24 includes the requirement for Strategic Landscaping including green infrastructure and is visualised on the north and west boundary. Whilst PHSV acknowledge this will be provided, the size and extent of this green infrastructure will be properly informed by technical reports support the planning application. 	Comment noted	
	<ul style="list-style-type: none"> Remove reference to the requirement for a development brief, incorporating an indicative masterplan to reflect the current position in respect of the imminent planning application. 	The Council considers that the indicative masterplan approach will ensure that development addresses the site allocation policy requirements for high quality sustainable development in this location in an integrated and co-ordinated manner.	
Policy wording modifications: None			
Pegasus Group for Robert Hitchins Ltd Joint site promoter (879)	<ul style="list-style-type: none"> Cam is identified in the Local Plan as a Tier 1 settlement and is the second largest in terms of population. Together with Dursley it has the best access to key services and facilities of anywhere in the District. 	Comment noted	
	<ul style="list-style-type: none"> In order to support the Reg 19 consultation, the promoters/developers have submitted the Design and Access Statement that has been prepared to support the applications for the site. 	Comment noted	
	<ul style="list-style-type: none"> Through the preparation of the planning applications it is evident that the site can deliver a number of dwellings above that currently proposed in the Reg 	Comment noted	



Site Reference: Strategic Site Allocation Policy PS24 Cam North West		
	19 plan. As a result of detailed technical work the allocation can deliver 1,030 new homes together with associated uses and infrastructure, in which case an increase in the quantum of development is sought.	
	<ul style="list-style-type: none"> The site is suitable, available and a deliverable site for development due to its location, access to services and facilities, limited physical constraints that can be brought forward for development without harm to biodiversity of heritage assets. 	Comment noted
	<ul style="list-style-type: none"> There is evidentially no need for early years or primary school places on this allocation and as such there is no requirement for on-site provision of a primary school including early years. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
Policy wording modifications: None		
SDC Cllr Haydn Jones (500)	<ul style="list-style-type: none"> Noise from the M5 motorway on the north west boundary of the site also poses a challenge to any future residents. 	On-site specifics, including site access, noise and highway safety, to be agreed at the planning application stage with Gloucestershire Highways. There are a range of options available to screen and reduce road noise.
	<ul style="list-style-type: none"> I support the limited number of identified sustainable development within the environs of existing large residential Stroud District communities. 	Comment noted
	<ul style="list-style-type: none"> The degree of local community support has diminished in proportion to the increase in proposed housing numbers. Cam Parish Council have rightly highlighted the danger of creating continuous built form from the Cotswold escarpment to the Severn Vale if PS24 and the site proposals at Slimbridge PS37 were to proceed. PS24 and PS37 would coalesce Cam with Slimbridge and the Severn Vale. 	The Council considers the proposed allocation to be of appropriate scale and size for this Tier 1 settlement. Justification for the role of Cam in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).
Policy wording modifications: None		



Site Reference: Strategic Site Allocation Policy PS24 Cam North West		
Sport England (133)	<ul style="list-style-type: none"> Sport England supports the Cam North West (west of Draycott) allocation, and we would advise applying our active design principles for the housing layout. 	Comments noted
	<ul style="list-style-type: none"> Welcome paragraph 4: Accessible natural green space providing a net gain to local biodiversity and public outdoor playing space, including on-site community building or access improvements and contributions to Jubilee Fields and contributions to off-site indoor sports and leisure facilities, in accordance with local standards. 	
Policy wording modifications: None		
Object		
Lichfields for CEG & Charfield Landowners Consortium (923)	<ul style="list-style-type: none"> It is essential that a full assessment of this new allocation and its impact on Junction 14 is carried out and that cross-boundary strategic matters are agreed with South Gloucestershire 	Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.
	Policy wording modifications: None	
Cam Parish Council (763)	<ul style="list-style-type: none"> Requires an average housing density within the site of 30 dph, that is higher than the ambient density of the host landscape led settlement character and would be highly likely to therefore be inconsistent with policies set out in the Cam Parish Neighbourhood Development Plan and Design Code. 	Topic Paper: Neighbourhood Planning October 2021 (EB5) explains the relationship between current adopted NDPs and the emerging Local Plan. Policy requires a layout, density and built form and character which conforms to the Cam Neighbourhood Plan Design Code.
	<ul style="list-style-type: none"> Strategic sites covering large areas of land can be subject to a wide range of constraints, which significantly reduce their gross to net ratios. It is not uncommon for strategic sites to have gross to net ratios around the lower end of the scale indicated above (i.e. 50% of gross site area). Stroud District Council's working assumption for PS24 is significantly more optimistic. Cam Parish Council notes that Stroud 	



Site Reference: Strategic Site Allocation Policy PS24 Cam North West		
	District Council's site assessment identifies a number of constraints that might well impact on the capacity of this site: e.g. Priority Habitat and noise from major roads. The Regulation 19 Pre-submission Draft Local Plan indicates a requirement for a significant landscape buffer around the northern and western boundaries of the site. Moreover, Policy PS24 confirms that land will be required for (among other things): a 2 form entry primary school; accessible natural green space (ANGSt); the structural landscape buffer referred to above; and SuDS infrastructure.	
	<ul style="list-style-type: none"> When designing housing layouts, the proposed mix is a critical determinant of land take. In order to meet the requirements of Policy DHC1 and Policy HC1, detailed designs for Strategic Site Allocation PS24 will need to be predicated on housing mixes that are broadly aligned with Table 2. Such schemes will therefore be heavily skewed towards larger, family homes (i.e. 3, 4 and 4+ bedroom dwelling types). This in turn will increase their land take, relative to schemes comprising larger numbers of smaller homes. 	Comment noted
	<ul style="list-style-type: none"> In order to meet the Cam Design Code requirements, a significant percentage of each parcel will need to be given over to on-plot green infrastructure components, which will contribute towards an interconnected network across the net developable area as a whole. As a consequence, the actual developable area (i.e. excluding various types of on-parcel green infrastructure) will be significantly smaller than the 29.3 hectares envisaged by Stroud District Council. Moreover, ensuring policy compliant housing mixes will put further downward pressure on numbers. The corollary is that meeting the Cam 	Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive or distinctive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.



Site Reference: Strategic Site Allocation Policy PS24 Cam North West		
	Design Code will result in a lower average net density than Stroud District Council has assumed. Cam Parish Council considers that assuming an average net density of around 25 dwellings per hectare (or less) would be more prudent, given local policy requirements.	
Policy wording modifications: None		
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> GWT is neutral on this allocation. A full ecological appraisal should be undertaken, including an EIA for impacts on the SPA, SAC and RAMSAR sites Additional adverse impacts on the cited features of the designated sites in the vale and estuary from increased recreational pressure must be avoided. 	Comment noted
Policy wording modifications: None		
CPRE Gloucestershire (847 & 894)	<ul style="list-style-type: none"> The map PS24 is inaccurate as it does not show the land already built over to the west of Box Road or the solar array behind it. 	Comment noted
	<ul style="list-style-type: none"> Should produce well designed, well-constructed housing, with garden and allotment provision and on street parking. 	Comment noted
	<ul style="list-style-type: none"> The 30% affordable housing quota must be maintained 	Comment noted
	<ul style="list-style-type: none"> Improvements to the Cam and Dursley Rail Station require National funding outside the control of SDC 	Comment noted
	<ul style="list-style-type: none"> The primary school and Early Years provision should be constructed and opened during the first stage of construction to facilitate the development of 'community'. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
Policy wording modifications: None		
Network Rail (3)	<ul style="list-style-type: none"> The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is 	Comment noted



Site Reference: Strategic Site Allocation Policy PS24 Cam North West		
	likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway.	
Policy wording modifications: None		
Stagecoach West (952)	<ul style="list-style-type: none"> Stagecoach maintains its previous unequivocal support for this proposed allocation which it believes is in conformity with NPPF, would be effective in supporting the delivery of the Strategic Objectives and the Key Priorities of this plan. 	Comment noted
	<ul style="list-style-type: none"> This location offers very particular scope to achieve significant augmentation of the bus and coach service offer both serving the site and the wider plan area. Today, this is currently quite limited. This is a particular merit of this site. 	Comment noted
	<ul style="list-style-type: none"> A broad strategy for bus service augmentation for the site is clearly identifiable. This will synergise very with other proposed allocations at the Wisloe New Settlement a close distance to the North, consolidation of the current Local Plan allocation at Cam North East, and around junction 13 of the M5, reflecting the benefits of steering development towards the Sustainable Movement Corridors, and in so doing leveraging density of flow. This synergy makes it highly likely that a higher level of bus and coach service will be achievable to and from the site, than that which would be supportable by this development alone. This aligns entirely with the Government's National Bus Strategy for England (April 2021) which sets expectations for "Super-routes" offering direct regular inter-urban links between main settlements in more rural areas 	Comment noted
	<ul style="list-style-type: none"> From September 2021, the baseline bus service position will change. This will strengthen connectivity 	Comment noted



Site Reference: Strategic Site Allocation Policy PS24 Cam North West		
	<p>between Cam, Dursley and Stroud, using the more direct route via Uley and past Nympsfield. Among other things, this also avoids peak congestion currently experienced by service 61 between Stonehouse, Ebley and Stroud.</p>	
	<ul style="list-style-type: none"> The current hourly rail service is well established, and we note the use of this service has grown immensely in the last few years, demonstrating its relevance even in its current form. This links to a large number of key destinations to the north and south where both empirical evidence and the transport evidence base make plain a large number of peak journeys assign, especially to the south. The improvement of this service to run every half-hour as an extension of MetroWest Phase 2 within the West of England is one that the Gloucestershire Rail investment Strategy (GRIS) indicates is one of four key investment priorities for rail in the County, and one that is assessed to offer very high value-for-money. 	Comment noted
	<ul style="list-style-type: none"> The site also will benefit from attractive walking and cycling connections both for recreational use, but most importantly, for other regular journey purposes. Segregated cycle facilities already exist along the A4135 corridor east of Millfields and Box Road which will be extended further west towards the proposed allocation, and there is obvious and readily achievable scope to extend these further to and within the allocated site. As a significant urban extension, the site will be able to benefit from a relatively high level of trip self-containment, while for off-site demands, the relatively short distances involved greatly support high levels of active travel 	Comment noted



Site Reference: Strategic Site Allocation Policy PS24 Cam North West		
	from the site, as well as bus use, especially with greatly improved frequencies being achievable from the development.	
Policy wording modifications:		
	<ul style="list-style-type: none"> It should be amended to read: <p>10. A layout which prioritises walking and cycling and access to public transport over the use of the private car by, for example, providing a network of internal walking and cycling and public transport routes that are shorter in distance than the highway network driving routes to key local destinations, in accordance with Manual for Streets;</p> <p>13. A bus loop through the site and bus stops and shelters at appropriate locations within the development to facilitate public transport permeability through the site; and bus stops and shelters at appropriate locations adjacent to the development to access existing, and new bus services on the A4135, will provided at a suitably early stage according to an agreed public transport phasing strategy., and Contributions will be sought to extend and/or otherwise enhance bus service connectivity and frequencies to key destinations including Gloucester, Stroud and Stonehouse;</p>	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
631	<ul style="list-style-type: none"> Building more houses is at odds with this aim. 	New Core Policy DCP1 Delivering Carbon Neutral by 2030 sets out the overarching requirements for all new development, to support the Council’s target to become Carbon Neutral by 2030.



Site Reference: Strategic Site Allocation Policy PS24 Cam North West		
Strategic growth and development locations		
489	<ul style="list-style-type: none"> Positive Sustainable development. 	Comment noted
489	<ul style="list-style-type: none"> Good facilities and services. 	Comment noted
393	<ul style="list-style-type: none"> Site should be for industrial uses not houses. 	Cam is identified as a sustainable urban extension to Cam, which will deliver a high quality housing development, including residential and community uses that meet the day to day needs of its residents.
Settlement hierarchy and place making		
478, 489, 576,	<ul style="list-style-type: none"> General support 	Comment noted
8, 95, 192, 238, 262, 317, 393, 395, 427, 440, 458, 522, 537, 566, 577, 630, 654, 664, 727, 729, 745, 799, 801, 843, 844	<ul style="list-style-type: none"> Original consultation was for 700 homes, it has now increased to 900 - 900 houses too high. 	The Council considers the proposed allocation to be of appropriate scale and size for this Tier 1 settlement. Justification for the role of Cam in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019).
344, 393, 395, 424, 542, 723, 729, 649, 660, 685, 693, 694,	<ul style="list-style-type: none"> Development goes against Cam Parish Council approved Neighbourhood plan. 	The Policy requires a layout, density and built form and character which conforms to the Cam Neighbourhood Plan Design Code.
93, 522, 654, 745, 799	<ul style="list-style-type: none"> Loss of individual communities' character and identity. 	Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive or distinctive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
478	<ul style="list-style-type: none"> Design needs more parking spaces. 	On-site specifics, including detailed site access proposals and highway safety, to be agreed at the planning application stage with Gloucestershire Highways and local parking standards.
344, 393, 440, 630,	<ul style="list-style-type: none"> Design density is too high. 	Core Policy CP8 New housing development and Core Policy CP4 Place



Site Reference: Strategic Site Allocation Policy PS24 Cam North West		
649, 654, 660, 672, 685, 693, 694, 723, 844		Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive or distinctive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.
192, 844	<ul style="list-style-type: none"> Won't deliver the proposed amount or enough affordable homes. 	Outside the AONB and designated rural parishes, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
Community facilities		
95, 102, 377, 393, 424, 522, 542, 584, 610, 722, 771	<ul style="list-style-type: none"> Not enough doctors. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
95, 377, 393, 424, 542	<ul style="list-style-type: none"> Not enough dentists. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
90, 102, 263, 424, 522, 542, 564, 584, 610, 672, 722, 771,	<ul style="list-style-type: none"> Not enough school places. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
Policy wording modifications: None		
Economy and Infrastructure		
Infrastructure		
94, 95, 102, 262, 264, 357, 377, 395, 424, 467, 522, 537, 542, 610, 654, 722, 747, 774, 799	<ul style="list-style-type: none"> Too many houses not enough infrastructure. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
706, 771, 799	<ul style="list-style-type: none"> Sewage and waste water wont cope. 	All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP (EB69). Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.



Site Reference: Strategic Site Allocation Policy PS24 Cam North West		
Retail and town centres		
102, 542, 564, 654, 672	<ul style="list-style-type: none"> Not enough shops/banks to support more development. 	Core Policy CP8 New housing development sets out requirements for good design to ensure development is appropriate in townscape, local environment, character and amenity terms.
Travel, transport and highways		
489	<ul style="list-style-type: none"> Good transport links & infrastructure. 	Comment noted
576	<ul style="list-style-type: none"> Site will bring transport and highway improvements. 	Comment noted
95, 102, 262, 263, 264, 281, 357, 376, 377, 537, 542, 564, 706, 722, 799	<ul style="list-style-type: none"> Current road network can't cope with traffic increases. 	Topic Paper – Transport October 2021 ((EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices and addressing air quality.
263, 377, 564	<ul style="list-style-type: none"> Rail links at capacity/inadequate. 	Topic Paper – Transport October 2021 ((EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices and addressing air quality.
Employment		
95, 729	<ul style="list-style-type: none"> Not enough jobs to support local growth. 	Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
90, 204, 262, 337, 386, 393, 424, 466, 522, 542, 584, 844	<ul style="list-style-type: none"> Loss of greenfield land. 	Sites that are on greenfield land classed as high quality agricultural land (Grades 1, 2 or 3a) are rated red, as having a significant negative (--) effect, for efficiency in land use and protection of soil quality regardless of size. Sites are allocated having regard to Sustainability Appraisal across 17 SA objectives; this is a balanced judgement taking all objectives into consideration, SA Report Appendix 4 (CD3b).
264, 610, 654, 774	<ul style="list-style-type: none"> Loss of agricultural land. 	Sites that are on greenfield land classed as high quality agricultural land



Site Reference: Strategic Site Allocation Policy PS24 Cam North West		
		(Grades 1, 2 or 3a) are rated red, as having a significant negative (--) effect, for efficiency in land use and protection of soil quality regardless of size. Sites are allocated having regard to Sustainability Appraisal across 17 SA objectives; this is a balanced judgement taking all objectives into consideration, SA Report Appendix 4 (CD3b).
264, 393	<ul style="list-style-type: none"> Negative impact on the general environment. 	On-site specifics; including strategic landscaping to provide accessible open space, minimise landscape impacts and safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.
264, 542, 745	<ul style="list-style-type: none"> Negative impact on Severn Estuary SSSI/SPA/SAC/Ramsar site. 	The site is located within the Severn Estuary SAC, SPA and Ramsar core catchment zone. Development proposals within this core catchment zone will be required to contribute to mitigation measures, in accordance with the agreed SAC Avoidance and Mitigation Strategy, in order to avoid an adverse effect on the integrity of the SAC associated with increased recreational activity over the plan period.
95, 315, 357, 467, 537, 542, 709, 771, 799	<ul style="list-style-type: none"> Surface water run off/flooding/river concerns. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
90, 204, 262, 264, 466, 542, 545, 564, 584, 600, 610, 630, 631, 799	<ul style="list-style-type: none"> Loss of biodiversity. 	On-site specifics; including strategic landscaping to provide accessible open space, minimise landscape impacts and safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.
264, 537	<ul style="list-style-type: none"> Light pollution. 	The Council considers PS24 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape and visual impacts.
631	<ul style="list-style-type: none"> Noise and air pollution will increase. 	<p>Topic Paper – Transport October 2021 ((EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices and addressing air quality.</p> <p>The Sustainability Appraisal includes assessment of all sites and reasonable</p>



Site Reference: Strategic Site Allocation Policy PS24 Cam North West		
		<p>alternatives against SA 10: To ensure that air quality continues to improve and SA11: To maintain and enhance the quality of ground and surface waters and to achieve sustainable water resources management in the District, SA Report Appendix 3 - 9 (CD3b).</p> <p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p>
Landscape		
600, 706	<ul style="list-style-type: none"> Negative impact on landscape. 	The Council considers PS24 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape and visual impacts.
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		





PS25

Site Reference: Strategic Site Allocation Policy PS25 Cam North East extension				
Number of representations: 142		Support: 9	Object: 130	Comment: 3
Stakeholders	Comments		Stroud District Council Response	
Support				
Sport England (133)	<ul style="list-style-type: none"> Sport England supports the Cam North Extension (East of the River Cam) allocation, and we would advise applying our active design principles for the housing layout 		Comment noted	
Policy wording modifications: None				
McLoughlin Planning for Terra Strategic (848) Site promoter	<ul style="list-style-type: none"> To ensure the deliverability of this site, it will require an independent access point to be provided. As part of this submission, a master planning exercise has concluded that there are opportunities to provide an independent access point to the south. The allocation should be adjusted to reflect this fact. 		<p>The Policy requires access through Northeast Cam (Allocated in the 2015 Local Plan). This will ensure the following criterion are met:</p> <p>11. High quality and accessible walking and cycling routes within the site including the retention and diversion of existing footpaths as necessary, the provision of a pedestrian and cycle crossing on the A4135 for safer access to/from Cam and Dursley station and Cam local centre and contributions towards the enhancement of off-site walking and cycling routes to key destinations including to Cam local centre, Draycott Business Park and Draycott Mills, local schools, the A38 and the Cam and Dursley Greenway;</p> <p>7. A strategic walking and cycling route which links up with the route along the disused railway line from Box Road and connects with Cam local centre and improves connectivity to the south;</p> <p>8. A layout which prioritises walking and cycling and access over the use of the private car by, for example, providing a network of internal walking and cycle routes that are shorter in distance than the highway network.</p> <p>Having a separate unnecessary access will not lead to a joined up approach and will risk the key aims of the development.</p>	
	<ul style="list-style-type: none"> The need to limit the deliverability of PS25 to the completion of the NE Cam site is unnecessary. Sufficient safeguards exist in other planning policies 		This is contradictory to the representor's first point, as the site promoter already wants to propose a different access and progress prematurely without the completion of NE Cam, which would likely result in the Policy	



Site Reference: Strategic Site Allocation Policy PS25 Cam North East extension		
	and professional best practice to ensure that this site will be delivered in an integrated manner.	criteria not being delivered. It is concerning the Council is being asked to rely on other 'sufficient safeguards' rather than the policy itself.
	<ul style="list-style-type: none"> Criterion 2 of the Policy requires open space and biodiversity net gain provision in accordance with other policies. At this stage, Terra consider that the evidence to support this requirement in the policy has not been tested and there are uncertainties on the deliverability of the allocation as proposed in the Plan 	The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.
	<ul style="list-style-type: none"> The site is not subject to any national or local level landscape designation. Incola has been appointed to advise on landscape a development. It considers that the current allocation does not follow existing field edge patterns and the result form of development would not 'fit' with the existing structure and character of the landscape. 	It will be important for the development to provide a strong strategic landscaping buffer along the eastern boundary to provide an appropriate long term settlement edge as viewed from higher ground to the south and east. Within the development, the layout should be permeable, prioritising walking and cycling and with a density, built form and character which conforms to the Cam Neighbourhood Plan Design Code.
	<ul style="list-style-type: none"> In terms of the extent of the potential development, the initial analysis undertaken shows that development of up to 10 metres in height can be accommodated up to the 55 metre contour. This expands the potential of the site to deliver a more considered masterplan, rather than as proposed by the allocation. 	The proposal to allow development of up to 10 metres in height up to the 55 meter contour line appears to increases the size of the developable area and wouldn't provide an appropriate long term settlement edge as viewed from higher ground to the south and east.
	<ul style="list-style-type: none"> The SFRA Note shows that the site is within Flood Zone 1, but there are very limited parts of the site, where it abuts the River Cam that are within Flood Zones 2 and 3. These areas are wholly unaffected by the site's development. 	At the master planning stage, the layout will be agreed to avoid areas of high flood risk. There will also be a requirement for an acceptable management and disposal of surface water, including sustainable drainage systems (SuDS) and adequate and timely infrastructure to tackle wastewater generated by the development, in agreement with the relevant water company.
	<ul style="list-style-type: none"> The site has been subject to a desk-based assessment and extended Phase 1 Habitat Survey. This demonstrates that the site is capable of supporting various species. However, as detailed in 	Comment noted



Site Reference: Strategic Site Allocation Policy PS25 Cam North East extension		
	Table 3 of the Document, there are design considerations and mitigation measures proposed which can address any impacts arising.	
	<ul style="list-style-type: none"> The attached Utilities Statement shows that the site has the potential to connect to all the main utilities. 	Comment noted
Policy wording modifications:		
	<ul style="list-style-type: none"> Redline allocation boundary amended, allowing creation of access onto the Upthorpe road. Allocation extent increased to allow for BNG and POS to be properly considered in the master planning of the site. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Object		
PJS Development Solutions Ltd for Bathurst Ltd (89)	<ul style="list-style-type: none"> Our objection is not in principle, as the site is clearly eminently suitable as a sustainable extension to the Millfields strategic urban extension (SA3 in the current Local Plan). 	Comment noted
	<ul style="list-style-type: none"> These submissions provided compelling evidence that these sites can, using quite conservative density assumptions, deliver substantially greater dwelling numbers than currently envisaged (180) in the Pre-Submission Revised Local Plan. Phase H6, within the SA3 consented area, can deliver an additional 56 units. Phases H7 and H8 can deliver at least 315 units, i.e. 135 more than indicated in the Draft Plan. 	The site is allocated for approximately 180 dwellings and associated community and open space uses to complete the North East of Cam (Millfields) strategic development site. A masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner and finalise numbers around the onsite constraints.
	<ul style="list-style-type: none"> Bathurst Ltd is left completely puzzled as to why the opportunities at Millfields are being limited and stymied, seemingly in favour of other less sustainable site options. 	The Councils believes approximately 180 dwellings is the appropriate scale for the site due to site constraints.
	Policy wording modifications: None	

Site Reference: Strategic Site Allocation Policy PS25 Cam North East extension		
Cam Parish Council (763)	<ul style="list-style-type: none"> The Plan has not been shaped with effective engagement between plan- makers and communities and specifically the policies in the adopted Cam NDP and the site should be deleted. 	Neighbourhood Plans are not a vehicle to block new development and CPC have been fully aware of the allocations process and proposals.
Policy wording modifications: None		
Lichfields for CEG & Charfield Landowners Consortium (923)	<ul style="list-style-type: none"> It is essential that a full assessment of this new allocation and its impact on Junction 14 is carried out. 	Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> A Statement of Common Ground with the Gloucestershire Authorities has been prepared but there is no Statement of Common Ground with South Gloucestershire on infrastructure matters and cross boundary matters 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course. SDC will work closely with all relevant bodies and follow the Duty to Cooperate.
Policy wording modifications: None		
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> GWT is neutral on this allocation. 	Comment noted
Policy wording modifications: None		
CPRE Gloucestershire (847 & 894)	<ul style="list-style-type: none"> Tree planting within the site to soften the impact of buildings when viewed from above in addition to the proposed buffer zones of trees is necessary. 	The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.
	<ul style="list-style-type: none"> Cam Neighbourhood Design Code. 180 dwellings should not look as though they have come straight out of the developer's catalogue 	The Policy requires a layout, density and built form and character which conforms to the Cam Neighbourhood Plan Design Code.
	<ul style="list-style-type: none"> Green permeability throughout the site is important so that any remaining wildlife can forage 	The Policy requires a Structural landscaping buffer along the eastern boundary incorporating existing and new native hedgerows and trees and linking with existing green Infrastructure.
Policy wording modifications: None		



Site Reference: Strategic Site Allocation Policy PS25 Cam North East extension		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
613	<ul style="list-style-type: none"> SDC has committed to be carbon neutral in 9 years' time, the proposed development will jeopardise this commitment. 	New Core Policy DCP1 Delivering Carbon Neutral by 2030 sets out the overarching requirements for all new development, to support the Council's target to become Carbon Neutral by 2030.
Strategic growth and development locations		
489	<ul style="list-style-type: none"> The site is in a more sustainable location than Sharpness and Wisloe 	Comment noted
489	<ul style="list-style-type: none"> The site could be either intensified or extended to take more development in this sustainable location. 	The Council considers the proposed allocation to be of appropriate scale, density and size for this Tier 1 settlement. Justification for Cam in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).
8, 90, 91, 183, 238, 255, 313, 315, 337, 395, 427, 464, 466, 541, 522, 551, 569, 607, 654, 690, 706, 735, 801, 843	<ul style="list-style-type: none"> Too much development in this area 	The Council considers the proposed allocation to be of appropriate scale, density and size for this Tier 1 settlement. Justification for Cam in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).
Settlement hierarchy and place making		
393	<ul style="list-style-type: none"> Developers are already looking at increasing the development if approved to beyond the 50m boundary. Draught plans have been drawn up, yet SDC have assured local residents this would not happen. 	Developers are free to draw up any plans they like, this does not mean they have been approved by the Council or will get planning permission.
393, 537, 577, 440, 344, 693, 649, 776, 579, 464, 729, 427, 660, 664	<ul style="list-style-type: none"> Cam residents believed that PS25 would be removed following the Parish Council objection letter. 	<p>The Statement of Community Involvement March 2020 (EB2) sets out how Stroud District Council has informed, engaged and consulted people throughout the plan preparation process.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including the results of</p>



Site Reference: Strategic Site Allocation Policy PS25 Cam North East extension		
		public consultation.
8, 312, 327, 344, 393, 395, 427, 414, 440, 456, 464, 525, 537, 540, 542, 563, 564, 577, 579, 588, 630, 649, 655, 660, 664, 672, 685, 693, 723, 729, 744, 776	<ul style="list-style-type: none"> This development goes against Cam Parish Council approved Neighbourhood plan and policies. Residents were told voting for the Neighbourhood plan would block PS25 	<p>Topic Paper: Neighbourhood Planning October 2021 (EB5) explains the relationship between current adopted NDPs and the emerging Local Plan.</p> <p>Where a neighbourhood plan precedes an emerging local plan, it should be prepared with consideration to the emerging local plan evidence base and draft policies. The neighbourhood plan will need to be in general conformity with strategic local polices and in any conflicting policies, the later plan will carry more weight.</p>
735	<ul style="list-style-type: none"> I understand the importance of a neighbourhood plan but the views of local residents must be considered 	The Neighbourhood Plan was written by the Parish Council and voted for adoption by a majority referendum of local people.
246, 281, 384, 672	<ul style="list-style-type: none"> The communities do not want this project 	<p>The Statement of Community Involvement March 2020 (EB2) sets out how Stroud District Council has informed, engaged and consulted people throughout the plan preparation process.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including the results of public consultation.</p>
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
8, 67, 90, 106, 262, 312, 344, 393, 395, 427, 440, 456, 458, 464, 537, 541, 577, 579, 649, 654, 660, 664, 693, 776, 803, 843, 864	<ul style="list-style-type: none"> Too dense and is not in-keeping with the existing settlement/character/historic environment 	Core Policy CP8 New housing development sets out requirements for good design to ensure development is appropriate in townscape, local environment, character and amenity terms.



Site Reference: Strategic Site Allocation Policy PS25 Cam North East extension		
812	<ul style="list-style-type: none"> Local anti-social behaviour and drug problems 	<p>The Local Plan evidence base demonstrates there are low levels of crime, but a disproportionate fear of crime in the area.</p> <p>Core Policy CP14 requires a design and layout that aims to assist crime prevention and community safety, without compromising other design principles.</p>
Community facilities		
315, 322	<ul style="list-style-type: none"> No community benefit either in terms of green spaces, parks, community rooms. 	<p>A masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner. Development will include:</p> <ol style="list-style-type: none"> 2. Accessible natural green space providing a net gain to local biodiversity and public outdoor playing space, in accordance with local standards; 3. Contributions towards off-site indoor sports and leisure facilities, education provision within the local area, the extension of existing health facilities at Cam and the enhancement of passenger facilities at Cam & Dursley station; 4. Structural landscaping buffer along the eastern boundary incorporating existing and new native hedgerows and trees and linking with existing green infrastructure;
67, 91, 102, 104, 315, 322, 456, 525, 537, 564, 569, 579, 581, 584, 588, 660, 672, 685, 735	<ul style="list-style-type: none"> Destruction of footpaths/PROW and bridge ways that allow access to the countryside 	<p>On-site specifics, including pedestrian, cycle and vehicular site access, highway safety and the incorporation of the existing PROW, to be addressed at the masterplan / planning application stage, in agreement with Gloucestershire Highways.</p>
104, 192, 357, 427, 588	<ul style="list-style-type: none"> Won't provide enough affordable housing 	<p>Outside the AONB or designated rural areas, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings.</p> <p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.</p>



Site Reference: Strategic Site Allocation Policy PS25 Cam North East extension		
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
489	<ul style="list-style-type: none"> Well related to higher order facilities and services 	Comment Noted
3, 255, 263, 322, 427 588, 627, 654, 684	<ul style="list-style-type: none"> New residents will move from Bristol and Gloucester but keep working there as there are no jobs locally 	<p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p> <p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p>
Retail and town centres		
489	<ul style="list-style-type: none"> Well related to higher order facilities and services 	Comment Noted
654	<ul style="list-style-type: none"> How will you resolve the problem with the banks closing branches in Dursley 	<p>All main UK banks are closing branches due to lack of demand, which the banks say makes branches unviable.</p> <p>This is outside of the remit of the local plan, however an increase in housing locally will only add to the demand for services and will benefit and may encourage the retention of services such as banks.</p>
102, 344, 383, 427, 440, 577, 627, 649, 693, 776	<ul style="list-style-type: none"> Not enough supermarkets 	<p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p> <p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p>



Site Reference: Strategic Site Allocation Policy PS25 Cam North East extension		
Travel, transport and highways		
489	<ul style="list-style-type: none"> • Good transport links 	Comment Noted
8, 91, 102, 104, 106, 183, 215, 246, 255, 262, 263, 281, 312, 313, 357, 376, 377, 384, 393, 395, 405, 415, 424, 456, 460, 478, 513, 525, 552, 566, 569, 590, 598, 627, 679, 694, 729, 801, 812	<ul style="list-style-type: none"> • No impact assessment has been carried out on: Increased road congestion Additional traffic Roads already at capacity High Street, A38 going north or south, M5 J14 already overcapacity Parking spaces are at capacity 	<p>Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.</p> <p>On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.</p>
654	<ul style="list-style-type: none"> • Single site access will cause bottleneck 	On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.
8, 322, 405, 424, 684	<ul style="list-style-type: none"> • Local public transport cannot support yet further increase 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>On-site specifics, including pedestrian, cycle and vehicular site access, highway safety and the incorporation of the existing PROW, to be addressed at the masterplan / planning application stage, in agreement with Gloucestershire Highways.</p> <p>Delivery Policy E112 requires development proposals that are likely to have a significant impact on the local transport network to submit a Transport Assessment, as well as a Travel Plan.</p>
263, 322, 344, 427, 440, 537, 564, 577, 649, 627, 660, 664, 684, 693, 776	<ul style="list-style-type: none"> • Rail station and network services at capacity 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
Infrastructure		
489	<ul style="list-style-type: none"> • Well related to higher order facilities and services 	Comment Noted



Site Reference: Strategic Site Allocation Policy PS25 Cam North East extension		
90, 91, 94, 215, 255, 263, 312, 313, 322, 395, 424, 427, 464, 542, 565, 566, 581, 627, 735, 774	<ul style="list-style-type: none"> General comment infrastructure wont cope/at capacity 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
91, 104, 106, 183, 238, 313, 312, 322, 344, 383, 393, 395, 405, 415, 414, 424, 427, 440, 464, 537, 542, 551, 570, 577, 581, 584, 588, 627, 649, 660, 693, 776, 812, 828, 942	<ul style="list-style-type: none"> Lack of facilities, such as: <ul style="list-style-type: none"> - Medical/Doctors - Dentists - Schools 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
102, 312, 322, 405, 581, 684	<ul style="list-style-type: none"> Insufficient drainage system 	All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP (EB69).
8, 91, 104, 187, 313, 344, 357, 377, 383, 384, 386, 393, 395, 427, 440, 456, 458, 460, 466, 467, 476, 522, 537, 542, 564, 565, 577, 581, 588, 649, 660, 664, 672, 685, 693, 729, 735, 771, 776, 799	<ul style="list-style-type: none"> No flood assessment has been carried out/flooding concerns as a result of development/run off 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
344, 393, 440, 577, 649, 693, 776, 801	<ul style="list-style-type: none"> Development will spoil view 	There is no legal right to a view and it is not a material planning consideration. However, design at planning application stage will take into



Site Reference: Strategic Site Allocation Policy PS25 Cam North East extension		
		account light and privacy matters when looking at orientation and layout.
460	<ul style="list-style-type: none"> Development should be of a high environmental standard 	The site requires a layout, density, built form and character which conforms to the Cam Neighbourhood Plan Design Code.
8, 67, 90, 91, 94, 106, 165, 183, 187, 208, 255, 262, 281, 313, 327, 337, 344, 377, 395, 414, 427, 440, 458, 460, 464, 466, 525, 542, 545, 564, 569, 577, 579, 581, 584, 607, 627, 630, 649, 654, 660, 664, 679, 685, 693, 694, 695, 727, 729, 735, 772, 774, 776, 799, 801, 843, 844, 942	<ul style="list-style-type: none"> No impact assessment has been carried out on the environmental damage Loss of vital green spaces Loss of Green Belt Evidence relating to the sustainability and landscape sensitivity appraisals of PS25 have been ignored by SDC. Loss of agricultural land Rackleaze local nature reserve will be compromised 	<p>The Council considers PS25 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.</p> <p>Sites that are on greenfield land classed as high quality agricultural land (Grades 1, 2 or 3a) are rated red, as having a significant negative (--) effect, for efficiency in land use and protection of soil quality regardless of size. Sites are allocated having regard to Sustainability Appraisal across 17 SA objectives; this is a balanced judgement taking all objectives into consideration, SA Report Appendix 4 (CD3b).</p>
8, 90, 91, 183, 255, 313, 334, 357, 377, 395, 427, 458, 460, 464, 466, 485, 525, 537, 542, 545, 551, 564, 569, 581, 584, 588, 600, 613, 654, 660, 664, 694, 685, 727, 735, 799, 801, 812	<ul style="list-style-type: none"> Loss of habitat and impacts on wildlife, birdlife, bats including from increased disturbance, noise and light pollution. newts, toads, slow worms, badgers, foxes, deer and otters 	The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.
709	<ul style="list-style-type: none"> Do not allow any hard non porous standing surfaces 	Comment Noted
Landscape		
165, 395, 456, 458,	<ul style="list-style-type: none"> Negative impact on landscape/views of AONB 	On-site specifics; including strategic landscaping to provide accessible open



Site Reference: Strategic Site Allocation Policy PS25 Cam North East extension		
464, 685, 672		space, minimise landscape impacts and safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.
344, 377, 415, 440, 427, 577, 588, 598, 649, 660, 664, 679, 685, 693, 735, 776	<ul style="list-style-type: none"> Negative impact light pollution / dark skies (AONB) 	<p>The Council considers Local Site Allocation PS05 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape and visual impacts.</p> <p>Delivery policy ES7 requires development proposals that are likely to impact on or create change in the landscape of the Cotswolds AONB to have particular regard to tranquillity and dark skies, amongst other natural and special qualities of the AONB.</p>
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
393, 464	<ul style="list-style-type: none"> The Covid pandemic has meant Stroud District Council (SDC) did not carry out the consultation fairly and there was no roadshow. 	<p>The Regulation 19 consultation regulations and requirements are set by the Government not SDC.</p> <p>Even without the then temporary Government ban on public consultation events, the consultation would still not have included face to face or roadshow events as these are not part of the Regulation 19 stage.</p>
344, 393, 427, 440, 456, 577, 649, 660, 664, 693, 776	<ul style="list-style-type: none"> A large proportion of the councillors that voted on the Plan in April 2021 are no longer in office and the meeting was held just one week before the local elections. Basically it was rushed through with no real thought given. 	This doesn't fall under the remit of the EIP.
Policy wording modifications: None		



PS27

Site Reference: Local Sites Allocation Policy PS27 1 - 25 Long Street, Dursley		
Number of representations: 46	Support: 14	Object: 31
Stakeholders	Comments	Stroud District Council Response
Support		
Dursley Town Council (507)	<ul style="list-style-type: none"> The evidence base for the Dursley Neighbourhood Development Plan (NDP) 2018 includes a Site Assessment for this area of land and suggests the use of the site for retail and recreation rather than housing. Policy requirements reflect original issues regarding the retention of parking, design in a conservation area and biodiversity. 	The site is allocated for partial redevelopment and re-use for town centre uses with potential to provide enhancements and additional uses to support the vitality of Dursley town centre.
	Policy wording modifications: None	Comment noted
Object		
No comments received	Policy wording modifications: None	
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> No significant initial concerns subject to a full ecological appraisal 	Comment noted
	Policy wording modifications: None	
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
281	<ul style="list-style-type: none"> No jobs in the area to support the amount of housing creating a commuter community that goes against all environmental policy. 	Comment not relevant to this Policy
Strategic growth and development locations		
513	<ul style="list-style-type: none"> In accordance with Local Plan objectives to use brownfield land. 	Comment noted
192	<ul style="list-style-type: none"> Too many houses and won't deliver the amount of 'affordable homes' promised. 	Comment not relevant to this Policy



Site Reference: Local Sites Allocation Policy PS27 1 - 25 Long Street, Dursley		
Settlement hierarchy & place making		
646, 799	<ul style="list-style-type: none"> Support development that respects the character of Dursley and the local area. 	Comment noted
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
No comments received		
Community facilities		
315	<ul style="list-style-type: none"> The area has an enormous number of new houses with no additional community benefit. 	Comment not relevant to this Policy
281	<ul style="list-style-type: none"> The communities do not want this project. 	The evidence base for the Dursley Neighbourhood Development Plan (NDP) 2018 includes a Site Assessment for this area of land and suggests the use of the site for retail and recreation.
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
646	<ul style="list-style-type: none"> Plans need to be made to ensure all developments also provide jobs for the residents. 	Comment not relevant to this Policy
Retail and town centres		
513	<ul style="list-style-type: none"> Dursley will benefit from people who live locally and can walk into town to use local facilities. 	Comment noted
Travel, transport and highways		
255, 377	<ul style="list-style-type: none"> Long Street is too narrow to cope with further development and additional parking pressure 	The site is allocated for partial redevelopment and re-use for town centre uses with potential to provide enhancements and additional uses to support the vitality of Dursley town centre, including enhanced pedestrian access and necessary parking for existing uses.
90, 263, 281, 376, 565	<ul style="list-style-type: none"> Inadequate local and strategic road and rail infrastructure to cope with additional population and 	Comment not relevant to this Policy



Site Reference: Local Sites Allocation Policy PS27 1 - 25 Long Street, Dursley		
	traffic.	
Infrastructure		
646	<ul style="list-style-type: none"> All developments must come in tandem with suitable improvements to local infrastructure and services to ensure these are sufficient. 	Comment noted
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
281, 542, 774	<ul style="list-style-type: none"> Loss of greenfields & historic farmland. 	Comment not relevant to this Policy
646	<ul style="list-style-type: none"> Developments need to be to the highest possible environmental standards to reduce environmental damage and significant rewilding needs to be carried out to offset the impacts of developments. 	On-site specifics, including conserving and enhancing heritage assets through high quality design and, and safeguarding and enhancing local biodiversity, to be addressed at the masterplan/ planning application stage.
281	<ul style="list-style-type: none"> Disturbance to wildlife, including bats, and loss of habitats. 	
709	<ul style="list-style-type: none"> Do not allow any hard non porous standing, parking areas for vehicles, including private drives. 	Comment noted
Landscape		
No comments received		
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		



PS28

Site Reference: Local Sites Allocation PS28 Land off Prospect Place, Dursley			
Number of representations: 44		Support: 14	Object: 28
Stakeholders	Comments		Stroud District Council Response
Support			
Dursley Town Council (507)	<ul style="list-style-type: none"> The original issues raised by Council in relation to the redevelopment of this site, linked to the community views and the NDP policies and project (D1, TC1, NE1, ES3 and Project E) have been reflected in the Draft Plan. This includes mixed use development, including employment and residential, the need to improve pedestrian access from Parsonage Street and vehicle access from May Lane, design and character sensitivities in the conservation area and safeguarding and enhancing local biodiversity. The Council supports the site. 	Comment noted	
Policy wording modification: None			
Object			
No comments received			
Policy wording modification: None			
Comment			
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> GWT is neutral on this allocation. GWT has no significant initial concerns regarding the impact of this allocation on biodiversity and ecological networks but a full ecological appraisal should be undertaken 	Comment noted	
Policy wording modification: None			
Other representations	Issues raised		Stroud District Council Response
Development Strategy			
Delivering carbon neutral			
No comments received			



Site Reference: Local Sites Allocation PS28 Land off Prospect Place, Dursley		
Strategic growth and development locations		
No comments received		
Settlement hierarchy and place making		
513, 799	<ul style="list-style-type: none"> Support brownfield development 	Comment noted
513	<ul style="list-style-type: none"> Supports the NDP position 	Comment noted
90, 192	<ul style="list-style-type: none"> Too much housing and won't be enough affordable homes 	<p>The Council considers the proposed allocation to be of appropriate scale and size for this Tier 1 settlement. Justification for the role of Dursley in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).</p> <p>Outside the AONB and designated rural areas, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.</p>
281, 542	<ul style="list-style-type: none"> No building on green belt 	Site is not green belt.
281	<ul style="list-style-type: none"> The communities do not want this site 	This site was included and voted for adoption by a majority at the NDP election.
Infrastructure and developer contributions		
No comments received		
Policy wording modification: None		
Homes and Communities		
Housing		
No comments received		
Community facilities		
No comments received		



Site Reference: Local Sites Allocation PS28 Land off Prospect Place, Dursley		
received		
Policy wording modification: None		
Economy and Infrastructure		
Employment		
No comments received		
Retail and town centres		
No comments received		
Travel, transport and highways		
281, 255, 376, 263	<ul style="list-style-type: none"> Road network cannot cope with increase of traffic/M5 junctions (13 & 14)/J15 are already at or beyond their capacity to deal with traffic at peak times. 	Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.
Infrastructure		
No comments received		
Policy wording modification: None		
Our Environment and Surroundings		
Natural environment		
646	<ul style="list-style-type: none"> Developments need to be to the highest possible environmental standards to reduce environmental damage. 	<p>Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.</p> <p>New Core Policy DCP1 Delivering Carbon Neutral by 2030 sets out the overarching requirements for all new development, to support the Council's target to become Carbon Neutral by 2030.</p> <p>The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem</p>



Site Reference: Local Sites Allocation PS28 Land off Prospect Place, Dursley		
		services.
709	<ul style="list-style-type: none"> Do not allow any hard non porous standing 	Comment noted
774	<ul style="list-style-type: none"> Can't build here its agricultural land 	Site is not agricultural land.
Landscape		
No comments received		
Historic environment		
No comments received		
Policy wording modification: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		



HAR017

Site Reference: Local Sites Allocation Policy HAR017 Land at Sellars Road, Hardwicke		
Number of representations: 25	Support: 11	Object: 13
Stakeholders	Comments	Stroud District Council Response
Support		
The Canal & River Trust (456)	<ul style="list-style-type: none"> Significant improvements have been delivered to the Gloucester & Sharpness towpath immediately to the north of the district boundary as a means of providing improved green infrastructure and a sustainable transport route towards the city. 	Comment noted
Policy wording modifications: None		
Bruton Knowles (881) Site promoter	<ul style="list-style-type: none"> Given the recent development of Redrow's scheme for 175 dwellings to the south, this site is very much now within the fabric of the built form of development. The site has effectively become isolated and surplus to requirements over recent years. Given there is an additional need for housing in Hardwicke, the site should be brought forward as a proposed housing allocation in the upcoming submission plan. 	Comment noted
Policy wording modifications: None		
Object		
No comments received		
Policy wording modifications: None		
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> GWT is neutral on this allocation. This allocation may contain areas of priority habitat so a full ecological appraisal should be undertaken before a decision is taken on its development suitability. 	Comment noted
Policy wording modifications: None		



Site Reference: Local Sites Allocation Policy HAR017 Land at Sellars Road, Hardwicke		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		
788	<ul style="list-style-type: none"> Need for greater cooperation between Gloucester and Stroud to see Tuffley, Quedgeley, Hunts Grove, Kingsway and Hardwicke as single urban area. 	The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan.
Settlement hierarchy and place making		
646	<ul style="list-style-type: none"> Developments need to be sensitive not to damage the local character of the area 	Core Policy CP8 New housing development sets out requirements for good design to ensure development is appropriate in townscape, local environment, character and amenity terms.
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
192	<ul style="list-style-type: none"> Too many houses overall and doubts over affordable homes' delivery. 	Outside the AONB or designated rural parishes, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
Community facilities		
No comments received		
Policy wording modifications: None		



Site Reference: Local Sites Allocation Policy HAR017 Land at Sellars Road, Hardwicke		
Economy and Infrastructure		
Employment		
646	<ul style="list-style-type: none"> Plans need to be made to ensure all developments also provide jobs for the residents. 	The Council considers the proposed allocation to be of appropriate scale and size for this Tier 3a settlement. Justification for the role of Hardwicke in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).
Retail and town centres		
No comments received		
Travel, transport and highways		
26	<ul style="list-style-type: none"> The roads around Sellars Road have not been built to withstand the increase in traffic. They are already in poor repair. 	<p>Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>On-site specifics, including road access from Bridge Keepers Way, to be addressed at the masterplan/ planning application stage together with opportunities to improve pedestrian and cycle linkages along the Gloucester and Sharpness Canal towpath</p>
Infrastructure		
646	<ul style="list-style-type: none"> All developments must come in tandem with suitable improvements to local infrastructure and services to ensure these are sufficient. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
646	<ul style="list-style-type: none"> Developments need to be to the highest possible environmental standards to reduce environmental damage and offset the impacts of developments. 	<p>New Core Policy DCP1 Delivering Carbon Neutral by 2030 sets out the overarching requirements for all new development, to support the Council's target to become Carbon Neutral by 2030.</p> <p>Core Policy CP8 New housing development sets out requirements for good design to ensure development will use sustainable construction techniques</p>



Site Reference: Local Sites Allocation Policy HAR017 Land at Sellars Road, Hardwicke		
		and provide renewable or low carbon energy sources in association with the proposed development.
709	<ul style="list-style-type: none"> Do not allow any hard non-porous standing, parking areas for vehicles, including private drives. 	Comment noted
Landscape		
No comments received		
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		



PS30

Site Reference: Strategic Site Allocation Policy PS30 Hunts Grove Extension			
Number of representations: 37		Support: 14	
Object: 21		Comment: 2	
Stakeholders	Comments	Stroud District Council Response	
Support			
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> Welcome alignment of the strategic GI with the core area of the Nature Recovery Network (NRN) on the south-western border of the allocation. 	Comment noted	
	<ul style="list-style-type: none"> Question whether there will be sufficient accessible natural greenspace and recreational greenspace to ensure the core NRN is not degraded by recreational pressure. 	On-site specifics; including strategic landscaping to provide accessible open space, minimise landscape impacts and safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.	
	<ul style="list-style-type: none"> There are several records of priority and protected species on site, which must be considered during an ecological appraisal. 	Comment noted	
	<ul style="list-style-type: none"> As a large strategic allocation, GI should be required to achieve the Building with Nature Benchmark or similar standards. 	On-site specifics; including strategic landscaping to provide accessible open space, minimise landscape impacts and safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.	
Policy wording modifications: None			
Rapeys LLP for Crest Nicholson Land and Partnerships (897) Site promoter	<ul style="list-style-type: none"> Supported continued allocation of Hunts Grove Extension for 750 dwellings. 	Comment noted	
	<ul style="list-style-type: none"> The Infrastructure Delivery Plan (IDP) should identify the infrastructure requirements, including the mitigation scheme at Junction 12 and other specific pinch points, funding and delivery mechanisms that are needed to support the Local Plan and make clear that public funding will be sought alongside any S106 contributions from the planned allocations. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.	
	<ul style="list-style-type: none"> PS30 Hunts Grove Extension is an existing development commitment forming part of the adopted development plan and as such should properly form part of the baseline for assessment when determining what infrastructure improvements are required to facilitate delivery of the emerging 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.	



Site Reference: Strategic Site Allocation Policy PS30 Hunts Grove Extension		
	Local Plan allocations.	
	<ul style="list-style-type: none"> The policy should be drafted to ensure that contributions sought relate to the marginal impact that each development will have on the operation of the highway network; accordingly, existing capacity should be assigned to existing commitments rather than treating all proposed allocations strategic allocations in the area, PS30, PS32, PS43, G1 and G2, in the same way. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
	Policy wording modifications:	
	<ul style="list-style-type: none"> Delete criterion 13 requiring the safeguarding of land for the potential future provision of a railway station which does not relate to land contained within the area covered by the allocation 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Copperfield for Colethrop Farm Ltd (906) Site promoter	<ul style="list-style-type: none"> Support continued allocation of Hunts Grove Extension for 750 dwellings. 	Comment noted
	<ul style="list-style-type: none"> Object to the inclusion of safeguarding of land for a future rail station on the basis this is not related to the PS30 allocation land. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
	Policy wording modifications:	
	<ul style="list-style-type: none"> Delete criterion 13 requiring the safeguarding of land for the potential future provision of a railway station. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Stagecoach West (952)	<ul style="list-style-type: none"> Support continued allocation of Hunts Grove Extension for 750 dwellings. 	Comment noted
	<ul style="list-style-type: none"> Sustainable location for housing growth adjacent to urban centre, employment and key public transport corridors. 	Comment noted
	<ul style="list-style-type: none"> Better located to serve housing needs of Gloucester City with alternative strategic sites available to meet Stroud's housing needs at Whitminster, including WHI014 Land East of Whitminster, well related to the main urban cluster at Stroud and Stonehouse. 	Comment noted
	<ul style="list-style-type: none"> Consolidates strategic development at Hunts Grove 	Comment noted



Site Reference: Strategic Site Allocation Policy PS30 Hunts Grove Extension		
	and will create additional critical mass of demand for services and amenities, including Stagecoach service 8.	
	<ul style="list-style-type: none"> All allocations need to make proper provision for public transport access on a phased basis to ensure timely delivery of services. 	Comment noted
	<ul style="list-style-type: none"> Emerging masterplan anticipates extension of service 8 to terminate within PS30. 	Comment noted
	<ul style="list-style-type: none"> Potential for providing access for the majority of dwellings within 400m of bus stops by exiting site to the west, towards the A38, and continuing as a loop or extended to terminate beyond the site. 	Comment noted
	<ul style="list-style-type: none"> Potential synergies with G1 Land at Hardwicke would enable extra connectivity to a wider range of destinations and delivery of relevant, attractive and efficient public transport provision. 	Comment noted
	<ul style="list-style-type: none"> Important contribution to transport related Strategic objectives and Key Issues of wider plan strategy for the Gloucester Southern Fringe. 	Comment noted
	<ul style="list-style-type: none"> Allocation wording needs to address the deliverability and costing of transport mitigations. 	Comment noted
	<ul style="list-style-type: none"> PS30 dependent for access on current development at Hunts Grove, including completion of the spine road and new signalised junction on the A38. 	Comment noted
	<ul style="list-style-type: none"> Concerns regarding impact of infrastructure provision on delivery trajectory for PS30 and overall development plan trajectory. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> The contributions to the development plan trajectory of Hunts Grove in the short term and PS30 in the medium term need to be demonstrably deliverable. 	<p>Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.</p> <p>The Council's Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure</p>



Site Reference: Strategic Site Allocation Policy PS30 Hunts Grove Extension		
		requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
Policy wording modifications:		
	<ul style="list-style-type: none"> Amend policy wording 10 – 12 to read: 10. Access arrangements and a layout within the site to encourage use of public and sustainable modes of transport and to encourage lower vehicle speeds which prioritises walking and cycling and access to public transport over the use of the private car by, for example, providing a network of internal walking and cycling and public transport routes that are shorter in distance than the highway network driving routes to key local destinations, in accordance with Manual for Streets; 11. Bus stops and shelters at appropriate locations to serve the new development 12. Contributions towards bus services to improve bus frequencies and quality; including support to sustainable transport measures on the A38 sustainable transport corridor that ensure that cycling and public transport in particular are offered safe and free flowing conditions, including on the relevant approaches to the Cross Keys junction in particular... 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Object		
Sport England (133)	<ul style="list-style-type: none"> Need to address the requirements of new residents to access indoor built sports facilities in addition to the policy requirement for the provision of accessible natural greenspace and publicly accessible outdoor playing-space, with appropriately scaled changing facilities. 	Comment noted
	<ul style="list-style-type: none"> The housing layout should be designed in accordance with active design principles. 	Comment noted



Site Reference: Strategic Site Allocation Policy PS30 Hunts Grove Extension		
	<ul style="list-style-type: none"> Policy wording needs to address indoor built sports provision or contributions towards improvements to existing facilities. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
Policy wording modifications: None		
National Trust (304)	<ul style="list-style-type: none"> Fully support comprehensive on-site green infrastructure and biodiversity provision within development allocations. 	Comment noted
	<ul style="list-style-type: none"> Increased recreational pressure on popular sites within the AONB, Haresfield Beacon and Topograph viewpoint, including open access land (grazed by cattle), a scheduled monument, SSSI and Regionally Important Geological Site. 	Minimising impacts within the Cotswolds AONB is identified in the policy wording as a particular issue to address. On-site specifics, including strategic landscaping/recreations use, will be addressed at the masterplan/ planning application stage.
Policy wording modifications:		
	<ul style="list-style-type: none"> Additional numbered point to be added to the policy: "Appropriate mitigation measures or replacement green infrastructure to safeguard the AONB from development pressure". 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
The Canal and River Trust (496)	<ul style="list-style-type: none"> Opportunity for contributions towards canal towpath improvements, between Sellars Bridge and Parkend to extend the existing safe, off road, active travel route into Gloucester city centre. Potential to link to Sustrans' reinstated NCN 41 route on the towpath to Sharpness. Opportunity for a new pedestrian bridge over the canal funded by contributions from allocations PS30, HAR017 and G1. 	A masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and coordinated manner.
Policy wording modifications: None		
Comment		
Joint Core Strategy (916)	<ul style="list-style-type: none"> Support policy requirement for a local centre to provide for the needs of the new community. 	Comment noted
	<ul style="list-style-type: none"> Particular concern re impact on M5 Junction 12. 	Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.



Site Reference: Strategic Site Allocation Policy PS30 Hunts Grove Extension		
	Policy wording modifications: None	
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		
489	<ul style="list-style-type: none"> Sustainable location for growth well related to higher order facilities and services, employment, transport links and opportunities. 	Comment noted
489	<ul style="list-style-type: none"> Capable of intensification or extension to take more development. 	Comment noted
489	<ul style="list-style-type: none"> Land at Hardwicke, Whaddon and Hunts Grove is a sensible focus for housing growth for Stroud District with Gloucester's housing focussed north of the City in association with the Gloucestershire Vision 2050 project and GFirst LEP Gloucestershire Local Industrial Strategy 2019. 	Comment noted
192	<ul style="list-style-type: none"> Too many houses overall and doubts over affordable housing delivery. 	Outside the AONB or designated rural parishes, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
Settlement hierarchy and place making		
646	<ul style="list-style-type: none"> Developments need to be sensitive not to damage the local character of the area. 	Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.
Infrastructure and developer contributions		



Site Reference: Strategic Site Allocation Policy PS30 Hunts Grove Extension		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
No comments received		
Community facilities		
788	<ul style="list-style-type: none"> Community services should be planned for across the wider area of Hunts Grove & Hardwicke (Stroud District), Tuffley, Quedgeley and Kingsway (Gloucester City) with greater cooperation between Local Authorities. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
26, 36, 48	<ul style="list-style-type: none"> Impact on existing local communities and services in Gloucester City, including Quedgeley, Tuffley and Kingsway. 	Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
646	<ul style="list-style-type: none"> Plans need to be made to ensure all developments also provide jobs for the residents. 	The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).
Retail and town centres		
No comments received		
Travel, transport and highways		
26, 36	<ul style="list-style-type: none"> Additional traffic and congestion on local road network. 	Topic Paper – Transport October 2021 ((EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices.



Site Reference: Strategic Site Allocation Policy PS30 Hunts Grove Extension		
37	<ul style="list-style-type: none"> Current road system from Hunts Grove onto Waterwells inadequate for additional traffic. 	On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.
Infrastructure		
646	<ul style="list-style-type: none"> All developments must come in tandem with suitable improvements to local infrastructure and services to ensure these are sufficient. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
37, 48, 57	<ul style="list-style-type: none"> Overdevelopment and loss of green space south of Gloucester 	Sites that are on greenfield land classed as high quality agricultural land (Grades 1, 2 or 3a) are rated red, as having a significant negative (--) effect, for efficiency in land use and protection of soil quality regardless of size. Sites are allocated having regard to Sustainability Appraisal across 17 SA objectives; this is a balanced judgement taking all objectives into consideration, SA Report Appendix 4 (CD3b).
646	<ul style="list-style-type: none"> Developments need to be to the highest possible environmental standards to reduce environmental damage and offset the impacts of development. 	The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.
709	<ul style="list-style-type: none"> Do not allow any hard non porous standing, parking areas for vehicles, including private drives. 	Comment noted
Landscape		
No comments received		
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments		



Site Reference: Strategic Site Allocation Policy PS30 Hunts Grove Extension		
received		
Policy wording modifications: None		



PS32

Site Reference: Employment Allocation Policy PS32 Quedgeley East Extension			
Number of representations: 29		Support: 10	Object: 18
Stakeholders		Comments	Stroud District Council Response
Support			
Copperfield for Colethrop Farm Ltd (906) Site promoter	<ul style="list-style-type: none"> Support the allocation in principle, but object to the limited set of land uses (B2 and B8) which is at odds with the Government's approach to flexible planning for business and inconsistent with the new land-use classes to provide necessary greater flexibility. 	<p>Para 82. NPPF (July 2021) states that planning policies should “set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period”. Para 83. NPPF (July 2021) states that planning policies and decisions should “recognise and address the specific locational requirements of different sectors” (paragraph 83).</p>	
	<ul style="list-style-type: none"> Employment-led, mixed use development (including the potential for housing, local retail and leisure/community uses) would: <ul style="list-style-type: none"> help to manage and support the relationship of the site with both Hunts Grove, Javelin Park and nearby Haresfield. support the reduction in commuting and address the climate emergency targets. create a more balanced development on the south side of the M5 	<p>Large industrial/warehousing units at key locations within the A38/M5 corridor was identified as one of the six key segments of market demand in the Gloucestershire Economic Needs Assessment (EB29) for future employment land supply to satisfy.</p> <p>This is a strategic employment site, supported within the Employment Land Review (EB30), and has been allocated to meet the needs of one of the key employment sectors. There are other policies within the plan that provide flexibility for other uses.</p>	
	Policy wording modifications: None		
	<ul style="list-style-type: none"> Allocate the site for employment-led, mixed use development (including the potential for housing, local retail and leisure/community uses) 		All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Object			
Woodland Trust (404)	<ul style="list-style-type: none"> There are ancient oaks within the site allocation which should be afforded increased protection. There should be a presumption in favour of the retention and enhancements of existing tree, woodland, and hedgerow cover. 		On-site specifics; including tree protection, to be addressed at the planning application stage.
	Policy wording modifications: None		
Comment			



Site Reference: Employment Allocation Policy PS32 Quedgeley East Extension		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> No significant initial concerns subject to a full ecological appraisal 	Comment noted
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		
788	<ul style="list-style-type: none"> Need for greater cooperation between Gloucester and Stroud to see Tuffley, Quedgley Hunts Grove, Kingsway and Hardwicke as single urban area 	The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate with Gloucester City Council in the production of the Stroud Local Plan.
192	<ul style="list-style-type: none"> There are too many houses. 	Comment not relevant to this site
513	<ul style="list-style-type: none"> This site is brownfield land. 	Comment noted
	<ul style="list-style-type: none"> It consolidates development in Quedgeley & Javelin Park 	Comment noted
	<ul style="list-style-type: none"> It is near Gloucester as a major centre of the population 	Comment noted
Settlement hierarchy and place making		
No comments received		
Infrastructure and developer contributions		
646	<ul style="list-style-type: none"> Development must come in tandem with suitable improvements to local infrastructure and services 	The council has produced an Infrastructure Delivery Plan (IDP) to support future development (EB69). Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation This will be published in due course.



Site Reference: Employment Allocation Policy PS32 Quedgeley East Extension		
Policy wording modifications: None		
Homes and Communities		
Housing		
26, 192	<ul style="list-style-type: none"> The houses being proposed are not going to meet the needs of those requiring social housing in their ever increasing numbers. 	Comment not relevant to this site
Community facilities		
26	<ul style="list-style-type: none"> There are currently not enough good school places at primary and secondary levels. 	Comment not relevant to this site
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
No comments received		
Retail and town centres		
No comments received		
Travel, transport and highways		
36	<ul style="list-style-type: none"> Increasing numbers of housing will affect the existing heavy traffic in these areas. 	Comment not relevant to this site
Infrastructure		
No comments received		
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
646	<ul style="list-style-type: none"> Development should be to the highest possible environmental standards to reduce environmental damage. 	Core Policy CP11 New employment development and Core Policy CP4 Place Making set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.
646	<ul style="list-style-type: none"> Development should be sensitive to not damage the local character of the area. 	
14, 57	<ul style="list-style-type: none"> It will cause additional environmental damage and 	



Site Reference: Employment Allocation Policy PS32 Quedgeley East Extension		
	over development of the area to the south of Gloucester. The area has already seen significant expansion in the last couple of decades.	
57	<ul style="list-style-type: none"> The erosion of our green areas is contributing to detriment of our environment and ultimately climate change square metre by square metre 	
709	<ul style="list-style-type: none"> Do not allow any hard non-porous standing, parking areas for vehicles, including private drives. 	Comment noted
Landscape		
No comments received		
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		

PS43

Site Reference: Employment Allocation Policy PS43 Javelin Park		
Number of representations: 33	Support: 14	Object: 17
Stakeholders	Comments	Stroud District Council Response
Support		
Gloucestershire County Council - Minerals & Waste Planning Authority (904)	<ul style="list-style-type: none"> The Policy clearly acknowledges waste management safeguarding requirements associated with the adjacent Javelin Park Energy from Waste (EfW) facility. 	Comment noted
Policy wording modifications: None		
Rubhicon Planning Ltd for Tritax Symmetry Gloucester Ltd (609) Site promoter	<ul style="list-style-type: none"> The site makes a significant contribution to Objectively Assessed Need for Employment Land. 	Comment noted
	<ul style="list-style-type: none"> The Plan's strategy of concentrating significant employment development along the motorway corridor and at J12 is appropriate given the strategic role of the motorway. 	Comment noted
	<ul style="list-style-type: none"> The site is suitable and deliverable for employment development within the plan period 	Comment noted
Policy wording modifications: None		
Object		
No comments received		
Policy wording modifications: None		
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> No significant initial concerns subject to a full ecological appraisal 	Comment noted
Policy wording modifications: None		
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> The site will generate vehicular movements and contribute to the Strategic Road Network as well as the highway network. 	Comment noted
	<ul style="list-style-type: none"> It is important that Javelin Park sits within the wider landscape context as highlighted by paragraph 3.413. The policy approach to address the AONB is to buffer along the eastern and southern boundaries. CFL 	Development will need to include a high quality of design and landscaping that minimises any potential visual impacts upon the heritage assets and their immediate settings at adjacent Haresfield and wider views from the Cotswolds AONB escarpment.



Site Reference: Employment Allocation Policy PS43 Javelin Park		
	advocate a more careful approach that simply buffering development. The design scale and quality of buildings are also critical, and the policy should reference these aspects as well.	Core Policy CP11 New employment development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.
	Policy wording modifications: None	
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
365	<ul style="list-style-type: none"> To reduce the need to travel, and increase the ability to walk/cycle to work, offices need to be embedded within the urban area, in city centre of major sub-centre. 	Development at this site will provide sustainable transport measures to link the site with Gloucester City, Stonehouse and Stroud and necessary improvements to the existing highway network.
Strategic growth and development locations		
365	<ul style="list-style-type: none"> Urban extension south of Gloucester is based on vehicle access and individual site by site development, as opposed to a spatial framework that maximises public transport efficiency and active travel. A spatial plan should deal with all the different elements, especially movement, in an integrated way, old and new areas together. 	<p>Development will be required to provide sustainable transport measures to link the site with Gloucester City, Stonehouse and Stroud and necessary improvements to the existing highway network.</p> <p>Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p>
788	<ul style="list-style-type: none"> Greater cooperation is required between Gloucester and Stroud to see Tuffley, Quedgeley Hunts Grove, Kingsway and Hardwicke as single urban area 	The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan
192	<ul style="list-style-type: none"> Too many houses. There will not be anywhere near as many 'affordable homes' as will be promised. 	Comment not relevant to this site.
214	<ul style="list-style-type: none"> The illustrative plan is incomplete in displaying the full extent of the current commitments 	A masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and coordinated manner.
Settlement hierarchy and place making		



Site Reference: Employment Allocation Policy PS43 Javelin Park		
646	<ul style="list-style-type: none"> Developments need to be sensitive not to damage the local character of the area. 	Core Policy CP11 New employment development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.
Infrastructure and developer contributions		
37	<ul style="list-style-type: none"> Inadequate road infrastructure. M5 JN12 is already over capacity according to Highways No clear fully funded improvements with a completion date. 	Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.
Policy wording modifications: None		
Homes and Communities		
Housing		
No comments received		
Community facilities		
No comments received		
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
646	<ul style="list-style-type: none"> Plans need to be made to ensure all developments also provide jobs for the residents. 	Land at Javelin Park (27 hectares), as identified is allocated for office, B2 and B8 employment uses.
Retail and town centres		
Rep no(s)		
Travel, transport and highways		
No comments received		
Infrastructure		
No comments received		



Site Reference: Employment Allocation Policy PS43 Javelin Park		
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
709	<ul style="list-style-type: none"> Do not allow any hard non-porous standing, parking areas for vehicles, including private drives. 	Comment noted
365	<ul style="list-style-type: none"> This location means generation of lorry traffic air pollution, noise and disruption. 	<p>Topic Paper – Transport October 2021 ((EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices and addressing air quality.</p> <p>The Sustainability Appraisal includes assessment of all sites and reasonable alternatives against SA 10: To ensure that air quality continues to improve based on sustainable access to employment and key services and facilities, SA Report Appendix 3 - 9 (CD3b).</p>
646	<ul style="list-style-type: none"> Developments need to be to the highest possible environmental standards to reduce environmental damage and significant rewilding needs to be carried out to offset the impacts of developments. 	<p>Core Policy CP11 New employment development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development is contextual and appropriate in townscape, local environment, character and amenity terms.</p> <p>The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.</p>
312	<ul style="list-style-type: none"> This whole area has been destroyed by the introduction of the monstrous incinerator. 	Comment noted
57	<ul style="list-style-type: none"> It will cause additional environmental damage and over development of the area to the south of Gloucester. The area has already seen significant expansion in the last couple of decades. 	<p>The Council considers PS43 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>The Council considers the proposed allocation to be of appropriate scale and</p>



Site Reference: Employment Allocation Policy PS43 Javelin Park		
		<p>size for this Tier 3a settlement. Justification for the role of Hardwick in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).</p> <p>The Council is required to plan for future housing and employment needs, it isn't a legal option to allow no more development due to the perception previous decades have already allowed enough expansion.</p>
Landscape		
No comments received		
Historic environment		
214	<ul style="list-style-type: none"> The phrase "that minimises any potential visual impacts upon the heritage..." is peculiar when considering the impact of the Incinerator at Junction 12. The background and wording needs to reflect the reality of the area. 	It is inaccurate to suggest new development doesn't need to 'minimises any potential visual impacts upon the heritage', simply due to one existing building being unpopular.
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		

G1

Site Reference: Strategic Site Allocation Policy G1 South of Hardwicke				
Number of representations: 35		Support: 12	Object: 17	Comment: 6
Stakeholders	Comments		Stroud District Council Response	
Support				
The Canal & River Trust (456)	<ul style="list-style-type: none"> Significant improvements have been delivered to the Gloucester & Sharpness towpath immediately to the north of the district boundary as a means of providing improved green infrastructure and a sustainable transport route towards the city. 		Comment noted	
	Policy wording modifications: None			
SDC Cllr Haydn Jones (500)	<ul style="list-style-type: none"> It is a critical component in the Stroud District Council Local Plan. It integrates positively within the Stroud District together with the more established and traditional built form in Hardwicke and Church Lane areas. This area enhances and serves Stroud District and a well-designed development here will deliver benefits for the district and provide valuable housing. 		Comment noted	
	Policy wording modifications: None			
Stagecoach (952)	<ul style="list-style-type: none"> Effective in sustainably meeting housing needs arising in Gloucester that cannot be accommodated within the City boundary. 		Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council's approach to identifying and assessing housing needs, including the approach to addressing unmet needs from Gloucester City.	
	<ul style="list-style-type: none"> Sustainable location adjoining the built-up area of Gloucester, with employment and key public transport corridors both adjacent and in the immediate vicinity. 		Comment noted	
	<ul style="list-style-type: none"> A range of facilities including secondary education are within walking distance to the north within Quedgeley, and the degree of pedestrian permeability though and beyond the site is actually quite high, with opportunities to provide both attractive and direct routes. 		Comment noted	
	<ul style="list-style-type: none"> We are concerned that there is no explicit requirement in Policy G1 for delivery of bus 		Strategic Site Allocation Policy G1 sets out the requirements for public transport permeability through the site and bus stops and shelters at	



Site Reference: Strategic Site Allocation Policy G1 South of Hardwicke		
	<p>permeability through the site at a suitably early stage.</p>	<p>appropriate locations within the development to access existing diverted and new bus services (Policy criteria 14) together with phasing arrangements to ensure that community provision is made in a timely manner (Policy criteria 20).</p> <p>Supporting text paragraph 3.4.20 highlights the role of the Sustainable Transport Strategy (EB60) in identifying interventions for the site to be embedded within the layout and design of the development and delivered at an early stage to ensure that sustainable transport enhancements are prioritised above the provision of additional highway capacity.</p>
	<ul style="list-style-type: none"> It fails to say much if anything about how the impact on the A38 will be addressed 	<p>Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.</p>
Policy wording modifications: None		
RPS Group for Redrow Homes Ltd (948) Site promoter	<ul style="list-style-type: none"> It has the ability to meet the needs of both Stroud District and/or the unmet needs at Gloucester. 	Comment noted
	<ul style="list-style-type: none"> All constraints, opportunities and characteristics of the site are thoroughly understood, and illustrative masterplan options have been prepared to demonstrate how the site could be developed, with all necessary mitigation incorporated 	Comment noted
	<ul style="list-style-type: none"> Concerns are requirement for Development Briefs and how the process will be resourced by the District Council. What status will the Development Brief hold and will it be formally adopted by the District Council? This process will cause delays in the determination of a planning application that has been submitted. A masterplan only approach would therefore be deemed more appropriate. Object to the unnecessary requirement in Policy G1 for a development brief and indicative masterplan to be approved by the Council. 	<p>The Council considers that the Development Brief incorporating an indicative masterplan will ensure that development addresses the site allocation policy requirements for high quality sustainable development in this location in an integrated and co-ordinated manner.</p>
	<ul style="list-style-type: none"> There has always been an assumption that the site would make provision for a 2FE primary school 	<p>Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.</p>



Site Reference: Strategic Site Allocation Policy G1 South of Hardwicke		
	located in a 2 hectare site to meet the needs of the development. We would therefore ask to see the evidence and rationale for the provision of a 3FE school given that Hardwicke already has an existing primary school.	
	<ul style="list-style-type: none"> The wording of the policy as currently written is not considered appropriate as it implies that on site mitigation for the Cotswold Beechwoods is required which would be unrealistic to deliver. SDC, in co-operation with other nearby councils, are developing a mitigation scheme in relation to the Cotswold Beechwoods SAC. 	Supporting text paragraph 3.4.18 highlights the importance of providing sufficient on-site recreation opportunities, in addition to off-site works if appropriate, to mitigate against the potential adverse impacts from additional visitor pressure on the Severn Estuary SAC/SPA/Ramsar and Cotswold Beechwoods SAC sites.
	<ul style="list-style-type: none"> Whilst we agree with the principle of providing additional connections for walking and cycling, and connections can be provided to the site boundary, we question the deliverability of providing connections into Quedgeley West Business Park as this would involve third party land. The policy should not be so specific in this regard. 	On-site specifics, including high quality and accessible walking and cycling routes within the site, the retention and diversion of existing footpaths as necessary, the provision of connections to Quedgeley West Business Park and local community facilities on Green Lane, in accordance with policy criteria 12, to be addressed at the masterplan/ planning application stage in agreement with Gloucestershire Highways.
	<ul style="list-style-type: none"> The highways strategy for the site seeks to provide a network of new roads that would relieve sections of Green Lane, Church Lane and Pound Lane by way of providing improved alternative routes for local traffic to gain access to the wider highway network. Primary access is not proposed from Sellars Road but from the A38 itself. Promoting primary access from Sellars Road would contradict the highway strategy for the site and as such should be removed. 	Strategic Site Allocation Policy G1 sets out the requirements for primary vehicular access from the A38 and additional vehicular access from Sellars Road, policy criteria 18.
	<ul style="list-style-type: none"> The wording of bullet point 19 (Infrastructure Enhancements bullet point is too vague. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> The site specific policy appears onerous and repeats many of the other policy provisions already included 	The wording of the site allocation policy and supporting text seeks to address specific concerns raised during consultation on the emerging plan



Site Reference: Strategic Site Allocation Policy G1 South of Hardwicke		
	<p>in the Plan. It is suggested that only site specific policies which aren’t otherwise covered by other Local Plan policies are included to reduce repetition and ensure a consistent approach is taken on the application of topic based objectives across all development proposals.</p>	<p>and set out the site specific policy framework for sustainable strategic development in this location.</p>
Policy wording modifications:		
	<ul style="list-style-type: none"> Replace paragraph 2 of the policy with: <i>“The Proposals will be required to deliver a masterplan that has been informed by detailed landscape, visual, heritage and ecological impact assessments and demonstrates an appropriate scale, layout and form.”</i> 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
	<ul style="list-style-type: none"> bullet point 2 should be re-worded to read – <i>“A 2FE Primary School (incorporating early years’ provision) on a 2.0 hectare site and contributions towards secondary school and further education provision”</i>. 	
	<ul style="list-style-type: none"> bullet point 4 should be re-worded to read – <i>“the development should consider any identified impacts in relation to the Severn Estuary SAC/SPA/Ramsar and Cotswold Beechwoods SAC and to contribute to the approved SDC mitigation schemes or undertake an independent mitigation strategy as appropriate”</i>. 	
	<ul style="list-style-type: none"> bullet point 12 should be re-worded to read – <i>“High quality and accessible walking and cycling routes within the site including the retention and diversion of existing footpaths as necessary, the provision of connections to local community facilities on Green Lane and contributions towards the enhancement of off-site walking and cycling routes to key destinations including to local schools, Quedgeley local centre and Gloucester city centre where appropriate”</i> 	
	<ul style="list-style-type: none"> bullet point 18 should be re-worded to read: <i>“Primary vehicular access from the A38 with</i> 	



Site Reference: Strategic Site Allocation Policy G1 South of Hardwicke			
	<p><i>necessary improvements to the existing highway network”;</i></p> <ul style="list-style-type: none"> bullet point 19 should be deleted. At this stage the IDP is not clear on what is required and can be justified to support the development at Land to the South of Hardwicke. 		
Object			
National Trust (304)	<ul style="list-style-type: none"> Popular sites within the AONB, including Haresfield Beacon and the Topograph viewpoint are a short drive from Gloucester's fringe. Haresfield Beacon comprises open access land (grazed by cattle), a scheduled monument, SSSI and Regionally Important Geological Site, and is popular with locals and visitors for its extensive views over the Severn Vale and beyond. Whilst we fully support comprehensive on-site green infrastructure and biodiversity provision with development allocations, the scale of new housing development at Gloucester's fringe and the 'draw' of the Cotswolds AONB and views could lead to significant additional visitor footfall and recreational pressure. 	<p>Strategic Site Allocation Policy G1 sets out the requirements for accessible natural green space providing a net gain to local biodiversity and public outdoor playing space, including on-site community building and contributions to off-site indoor sports and leisure facilities, in accordance with local standards, policy criteria 3.</p> <p>Supporting text paragraph 3.4.18 highlights the importance of providing sufficient on-site recreation opportunities to mitigate against additional visitor pressure on sensitive locations, in addition to off-site improvements where appropriate, to mitigate against the potential adverse impacts from on the Severn Estuary SAC/SPA/Ramsar and Cotswold Beechwoods SAC sites.</p>	
	<ul style="list-style-type: none"> Para 170 of the NPPF requires that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and sites of biodiversity value. Para 171 states that plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure. 	<p>Strategic Site Allocation Policy G1 sets out the requirements for a structural landscaping buffer along the western, southern and eastern boundaries incorporating existing and new native hedgerows and trees and linking with existing green infrastructure, policy criteria 7.</p> <p>Supporting text paragraph 3.4.17 highlights the role of substantial structural landscaping to create sustainable green corridors and to protect Hardwicke's landscape setting and the adjacent Gloucester and Sharpness Canal.</p>	
	Policy wording modifications: None		
	<ul style="list-style-type: none"> An additional numbered point should be added to read: <i>“Appropriate mitigation measures or</i> 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.	



Site Reference: Strategic Site Allocation Policy G1 South of Hardwicke		
	<i>replacement green infrastructure to safeguard the AONB from development pressure”.</i>	
Comment		
Hardwicke Parish Council (299)	<ul style="list-style-type: none"> The proposal is considered excessive and believed not possible without seriously degrading the environmental provision that could be effectively realised with a lesser density. 	The Council considers Strategic site allocation G1 in accordance with the development strategy. Topic Paper: The Development Strategy October 2021 (EB4) sets out the Council's approach to identifying and assessing potential spatial strategy options and how the development strategy was selected to meet requirements, including an increased contribution from strategic urban extension sites from the sustainable intensification of development.
	<ul style="list-style-type: none"> To integrate the development with Hardwicke, to mitigate noise from the A38 and to protect Hardwicke's landscape setting can only be achieved by accepting a lower number of dwellings on the site. 	
	<ul style="list-style-type: none"> The capacity should be reduced to 1200 dwellings 	
	<ul style="list-style-type: none"> The higher number of houses proposed will also make it difficult for SDC to implement its stated strategy included within the pre-submission document, particularly in this area, to enhance the natural environment and avoid and mitigate the indirect impacts of development upon it. 	
	<ul style="list-style-type: none"> Particular care will be required to ensure that the layout and design of the development conserves and enhances the heritage assets within and adjacent to the site, particularly Hardwicke Church and surrounds. 	Strategic Site Allocation Policy G1 sets out the requirements for the layout, density and built form and character to reflect Hardwicke and relevant design policies set out within the Hardwicke neighbourhood Plan, policy criteria 10. Core Policy CP8 New housing development and Core Policy CP4 Place Making, supported by Delivery Policy ES10, set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.
	<ul style="list-style-type: none"> School provision on this site seems excessive with the proposal for a 3 form entry for the proposed development 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
<ul style="list-style-type: none"> There will significantly impact on the areas ability to contain and manage the drainage and serious 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application	



Site Reference: Strategic Site Allocation Policy G1 South of Hardwicke		
	<p>flooding issues that already exist in this location</p>	<p>stage.</p> <p>Strategic Site Allocation Policy G1 sets out the requirement for the acceptable management and disposal of surface water, including policy criteria 8.</p> <p>Supporting text paragraph 3.4.19 highlights the need for careful consideration to ensure that neither the development nor areas downstream are at risk of flooding and that surface water attenuation facilities will be required to serve discrete areas of development. In addition, the Council will seek opportunities to reduce the overall level of flood risk in the area, improve flood storage capacity and enhance biodiversity through the layout, use and form of the development.</p>
	<ul style="list-style-type: none"> The site already has a diverse collection of wildlife that has been observed. 	<p>Comment noted</p>
<p>Policy wording modifications: None</p>		
<p>Rapleys LLP for Crest Nicholson Land and Partnerships (897)</p>	<ul style="list-style-type: none"> The policy should include provisions to ensure that access proposals to the site from the A38 are fully compatible with the approved main site access to the Hunts Grove new community and should not compromise the delivery of Hunts Grove and the Hunts Grove extension carried forward under PS30 in any way 	<p>Strategic Site Allocation Policy G1 sets out the requirements for primary vehicular access from the A38 and additional vehicular access from Sellars Road, with necessary improvements to the existing highway network, policy criteria 18.</p> <p>On-site specifics, including detailed site access proposals and highway safety, to be agreed at the planning application stage with Gloucestershire Highways</p>
	<ul style="list-style-type: none"> The Policy should include a requirement to ensure that proportionate contributions are made to necessary transport infrastructure improvements, including to the strategic road network, to ensure the timely delivery of development within the Gloucester Fringe sub area. 	<p>Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.</p>
	<p>Policy wording modifications: None</p>	
<p>Joint Core Strategy (916)</p>	<ul style="list-style-type: none"> The main concern for the JCS authorities is to ensure that the level of growth can be accommodated on the immediate and wider highway network, and that 	<p>Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.</p>



Site Reference: Strategic Site Allocation Policy G1 South of Hardwicke		
	<p>the development provides as much of the community and social infrastructure needs as possible.</p> <ul style="list-style-type: none"> It is important to ensure that there is capacity in secondary schools, or that capacity can be created, to accommodate the level of demand generated. It is important to ensure that capacity for healthcare exists, or can be created, to provide for the needs of an additional 1350 new homes To ensure against future urban sprawl, it would be helpful for the policy to include a requirement to create a firm edge of the development to the southern extent of the site. 	<p>Strategic Site Allocation Policy G1 sets out the requirements for a structural landscaping buffer along the western, southern and eastern boundaries incorporating existing and new native hedgerows and trees and linking with existing green infrastructure, policy criteria 7.</p>
Policy wording modifications: None		
Copperfield for Colethrop Farm Ltd (906)	<ul style="list-style-type: none"> For the emerging allocation policy for Hardwicke to be effective, it should ensure that proposals are compatible with those already in place to serve the current Hunts Grove allocation (continued into the eSDLP through policy PS30). 	<p>Strategic Site Allocation Policy G1 sets out the requirements for primary vehicular access from the A38 and additional vehicular access from Sellars Road, with necessary improvements to the existing highway network, policy criteria 18.</p> <p>On-site specifics, including detailed site access proposals and highway safety, to be agreed at the planning application stage with Gloucestershire Highways</p>
	<ul style="list-style-type: none"> The policy should also ensure that Hardwicke (and other proposed allocations) make appropriate contributions towards transport infrastructure, including the Strategic Road Network to support overall delivery. 	<p>Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.</p>
Policy wording modifications: None		
Sports England (133)	<ul style="list-style-type: none"> Sport England supports the Strategic Site Allocation Policy G1, and we would advise applying our active design principles for the housing layout 	<p>Comment noted</p>
	<ul style="list-style-type: none"> We welcome paragraph 3 	<p>Comment noted</p>
	<ul style="list-style-type: none"> Local Standards is not something Paragraph 96 of the 	<p>Strategic Site Allocation Policy G1 sets out the requirements for accessible</p>



Site Reference: Strategic Site Allocation Policy G1 South of Hardwicke		
	<p>NPPF supports, but rather assessments which define what local provision is needed.</p> <ul style="list-style-type: none"> The adopted Playing pitch Strategy (PPS) does not set standards for the amount of playing field, but rather the sizes and types of pitches required depending on the size of development. Consideration should be given to cross border leisure provision with Gloucester City Council. 	<p>natural green space providing a net gain to local biodiversity and public outdoor playing space, including on-site community building and contributions to off-site indoor sports and leisure facilities, in accordance with local standards, policy criteria 3.</p> <p>The Council's Open Space, Green Infrastructure, Sport and Recreation Study (2019) (EB41) identifies new quantity, quality and accessibility minimum standards of provision for the District based on current and projected needs.</p> <p>The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan.</p>
Policy wording modifications: None		
SF Planning for Gloucestershire County Council Asset Management and Property Services (882) Site promotor	<ul style="list-style-type: none"> The site is an acceptable location for future residential development and all parts of the original submission site (ref. HAR002) should be considered deliverable. 	Comment noted
Policy wording modifications: None		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> GWT is neutral on this allocation and pleased to see that the allocation design appears to have designed green infrastructure protect and enhance important areas of the NRN. The Trust is disappointed that the Biodiversity requirements are limited to BNG when the Trust has previously raised concerns about the impact on important Water vole populations. The development must not negatively impact populations of protected or threatened species. There should be no modification of the watercourse and re-naturalisation is desirable where modification has previously occurred. Measures will be required to remove the threat posed by additional domestic cat 	<p>Comment noted</p> <p>The Shorn Brook passes through the central and western parts of the site and the Gloucester & Sharpness Canal forms its western boundary. The disposal of surface water run-off will require careful consideration to ensure that neither the development nor areas downstream are at risk of flooding. Surface water attenuation facilities will be required to serve discrete areas of development.</p> <p>The Council will seek opportunities to reduce the overall level of flood risk in the area, improve flood storage capacity and enhance biodiversity through the layout, use and form of the development. To address existing</p>



Site Reference: Strategic Site Allocation Policy G1 South of Hardwicke		
	<p>predation on water vole populations, as this can drive local extinctions. The site has several significant large trees across it, all of which should be retained by the design.</p>	<p>wastewater issues in the local area, Severn Trent has a sewer capacity improvement scheme in place for the Gloucester fringe and the scheme will need to take into account the requirements of this site.</p>
	<ul style="list-style-type: none"> A full ecological appraisal should be undertaken, including an EIA for impacts on the SPA, SAC and RAMSAR sites. Additional adverse impacts on the cited features of the designated sites from increased recreational pressure must be avoided 	<p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p> <p>The site is located within the catchments of both the Severn Estuary SAC, SPA/ Ramsar and Cotswold Beechwoods SAC sites. Development proposals within these core catchment zones will be required to contribute to mitigation measures, in accordance with the agreed SAC Avoidance and Mitigation Strategy, in order to avoid an adverse effect on the integrity of the SAC associated with increased recreational activity over the plan period.</p>
	<ul style="list-style-type: none"> Evidence must be provided that green space provided on site is of sufficient size and quality to make it a desirable alternative to sensitive biodiversity sites and land functionally linked to them. This could be ensured by requiring the site to achieve the Building with Nature Benchmark or similar standards for GI. 	<p>The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.</p>
	<ul style="list-style-type: none"> A substantial buffer of suitable natural habitat at least 15 metres either side of the brook should be established and maintained during both construction and occupation. 	<p>Comment noted</p>
<p>Policy wording modifications: None</p>		
Other representations	Issues raised	Stroud District Council Response
<p>Development Strategy</p>		
<p>Delivering carbon neutral</p>		
<p>No comments received</p>		
<p>Strategic growth and development locations</p>		



Site Reference: Strategic Site Allocation Policy G1 South of Hardwicke		
489	<ul style="list-style-type: none"> Very well related to higher order facilities and services, has better transport links and opportunities and is far better related to employment opportunities than proposed development at growth points. 	Comment noted
489	<ul style="list-style-type: none"> In a more sustainable location than Sharpness and Wisloe 	Comment noted
489	<ul style="list-style-type: none"> The site could be either intensified or extended to take more development. 	Comment noted
Settlement hierarchy and place making		
646	<ul style="list-style-type: none"> Developments need to be sensitive not to damage the local character of the area. 	<p>Strategic Site Allocation Policy G1 sets out the requirements for the layout, density and built form and character to reflect Hardwicke and relevant design policies set out within the Hardwicke neighbourhood Plan, policy criteria 10.</p> <p>Core Policy CP8 New housing development and Core Policy CP4 Place Making, supported by Delivery Policy ES10, set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.</p>
513	<ul style="list-style-type: none"> Development along A38 will create a huge straggling area of housing, not in keeping with the Severn Valley. 	<p>Strategic Site Allocation Policy G1 sets out the requirements for the layout, density and built form and character to reflect Hardwicke and relevant design policies set out within the Hardwicke neighbourhood Plan, policy criteria 10.</p> <p>Supporting text paragraph 3.4.17 highlights the envisaged development as a series of neighbourhoods linking seamlessly with areas of Hardwicke with a layout, density, built form and character which reflects Hardwicke and relevant design policies contained within the Hardwicke Neighbourhood Plan.</p>
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		

Site Reference: Strategic Site Allocation Policy G1 South of Hardwicke		
Homes and Communities		
Housing		
192	<ul style="list-style-type: none"> Too many houses. There will not be anywhere near as many 'affordable homes' as will be promised. 	Outside of the AONB and designated rural parishes, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
Community facilities		
788	<ul style="list-style-type: none"> There should be substantially greater cooperation between Gloucester and Stroud to see Tuffley, Quedgeley Hunts Grove, Kingsway and Hardwicke as single urban area and to plan community services at this level. 	The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan.
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
358	<ul style="list-style-type: none"> Close to county council growth /employment zone. 	Comment noted
Retail and town centres		
No comments received		
Travel, transport and highways		
513	<ul style="list-style-type: none"> Additional pressure on travel, roads, local infrastructure. 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>On-site specifics, including pedestrian, cycle and vehicular site access, highway safety and the incorporation of the existing PROW, to be addressed at the masterplan / planning application stage, in agreement with</p>



Site Reference: Strategic Site Allocation Policy G1 South of Hardwicke		
		Gloucestershire Highways. Delivery Policy EI12 requires development proposals that are likely to have a significant impact on the local transport network to submit a Transport Assessment, as well as a Travel Plan.
Infrastructure		
No comments received		
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
57	<ul style="list-style-type: none"> Constant erosion of our green areas is contributing to detriment of our environment and ultimately climate change. 	The Council considers Strategic site allocation G1 in accordance with the development strategy. Topic Paper: The Development Strategy October 2021 (EB4) sets out the Council's approach to identifying and assessing potential spatial strategy options and how the development strategy was selected to meet requirements, informed by Sustainability Appraisal (CD3).
57	<ul style="list-style-type: none"> It will cause additional environmental damage and over development of the area to the south of Gloucester. 	
709	<ul style="list-style-type: none"> Do not allow any hard non-porous standing, parking areas for vehicles, including private drives. 	Comment noted
Landscape		
No comments received		
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		

G2

Site Reference: Strategic Site Allocation G2 Land at Whaddon		
Number of representations: 77	Support: 12	Object: 57
Stakeholders	Comments	Stroud District Council Response
Support		
Ridge and Partners LLP for Newland Homes (910) Site promoter	<ul style="list-style-type: none"> The Inspector for the JCS concluded that the site would “make an appropriate allocation to help meet the housing requirements of Gloucester and the JCS area”. 	Comment noted
	<ul style="list-style-type: none"> Newland have worked with the Taylor Wimpey and L&Q to produce a joint masterplan to support the allocation. The masterplan for the site provides a well- considered approach which address the site boundaries ensuring a landscape edge to the land parcel, along with both highway and footpath links to adjacent development opportunities. 	Comment noted
	<ul style="list-style-type: none"> Supporting this representation is a technical Highways note that’s concludes that the development of the site can be accommodated with limited and proportional improvements to the highway network. Ecology consultants have been appointed for advice on landscape and visual considerations. 	Comment noted
	<ul style="list-style-type: none"> The council should modify the policy to enable delivery, avoid delays and provide clarity for developers and decision makers. To provide clarity additional text should be drafted that ensures that a planning application may come forward prior to conclusion of either the JCS or Gloucester City’s Plan. 	Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council’s approach to identifying and assessing housing needs, including the plan-led approach to addressing unmet needs from Gloucester City.
Policy wording modifications: None		
Savills for L&Q Estates (913) Site promoter	<ul style="list-style-type: none"> Support Land at Whaddon in the Plan as a suitable and sustainable location for growth. L&QE are working alongside the other promoters, Taylor Wimpey and Newland Homes, to deliver a 	Comment noted



Site Reference: Strategic Site Allocation G2 Land at Whaddon		
	coordinated approach to development in this location.	
	<ul style="list-style-type: none"> Concern that it is a 'safeguarded' site. The site should be allocated now and not tied to the future needs of Gloucester City. 	Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council's approach to identifying and assessing housing needs, including the approach to addressing unmet needs from Gloucester City.
	<ul style="list-style-type: none"> The land area in the southwest corner of the Local Plan map does not form part of the development proposals. <ul style="list-style-type: none"> The site boundary should be revised (and the evidence base, notably the Viability Assessment refined to ensure that it reflects the development proposed). 	<p>Comment noted regarding the G2 allocation map boundary. The Council will agree the correct boundaries with the site promoter.</p> <p>The Council's Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.</p> <p>Ahead of the EIP, the Council is also updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.</p>
	<ul style="list-style-type: none"> Suggest that the plan on p160 references the land falling within the Gloucester boundary and, within the policy explanatory text, wording is added to ensure that this area forms part of the comprehensive planning undertaken in regard to the site 	Comment noted. The Council will review the multiplicity of boundary line colours in this location on Maps on pages 155 and 160. The Council will continue discussions with the site promoter to seek that any area within Gloucester City can form part of any comprehensive future planning work.
	<ul style="list-style-type: none"> The site does not represent a suitable location for this provision for travelling showpeople. The highways to the north and south not suitable for this access. 	On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.
	<ul style="list-style-type: none"> We support the provision of education facilities on the site, however do not consider that the scale of provision required reflects actual need 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> Whilst the policy doesn't preclude more than two site accesses, the way it is drafted could infer this. We suggest that the wording 'and others as agreed through the planning application process' should be added. 	<p>Strategic Site Allocation Policy G2 sets out the requirements for primary vehicular access from the A4173 and additional vehicular access from Grange Road, policy criteria 20.</p> <p>The G2 site allocation policy map identifies three potential access points,</p>



Site Reference: Strategic Site Allocation G2 Land at Whaddon		
		two from the A4173 and one from Grange Road.
	<ul style="list-style-type: none"> The IDP identifies all infrastructure associated with development across the district – it doesn't distinguish between CIL or s106; and is fairly high level in its nature. References to the IDP should be moved to the explanatory text as providing the starting point for the discussions. 	Strategic Site Allocation Policy G2 sets out the site specific policy framework for sustainable strategic development in this location, including any associated infrastructure enhancements required and identified in the Stroud Infrastructure Delivery Plan in this location, policy criteria 20.
	<ul style="list-style-type: none"> Reference is made to an 'approved' strategy. We assume this is referring to the emerging JCS Review, however, it is unclear what is intended by the word 	Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council's approach to identifying and assessing housing needs, including the approach to addressing unmet needs from Gloucester City.
	<ul style="list-style-type: none"> The adoption of the JCS Review is not anticipated until after the Stroud examination will have been completed and hence it is assumed that the word 'approved' in fact refers to the publication of the draft JCS which is expected before the end of 2021. For clarity, this should be confirmed, and more explicitly referenced in the Plan. 	
Policy wording modifications: None		
Joint Core Strategy (916)	<ul style="list-style-type: none"> The JCS authorities support the safeguarding of this site to meet Gloucester City's unmet development needs, including residential development and plots for Travelling Showpeople, for which there is currently unmet need, should it be required and in accordance with the JCS Review Strategy. 	Comment noted
	<ul style="list-style-type: none"> The City Council continues to have concerns regarding the impact of the scale of planned growth in this area on the immediate and wider highway network, particularly St Barnabas Roundabout. However, it is noted that the evidence prepared by Mott MacDonald demonstrates that that the level of growth can be accommodated with interventions and provides an appropriate level of evidence for plan- 	Comment noted

Site Reference: Strategic Site Allocation G2 Land at Whaddon		
	<p>making purposes.</p> <ul style="list-style-type: none"> The JCS authorities have concerns regarding the effectiveness of the policy and suggest this could be addressed through the inclusion of a trigger / mechanism for the point at which the site would move from a safeguarded site, to an allocation and/or the entering into a memorandum of understanding. As a point of clarity, the wording of the policy at G2 identifies the site should deliver 'at least' 2,500 homes, but elsewhere in the document the capacity is referred to as 3,000 new homes. To improve the effectiveness of the plan, it would be helpful if the anticipated capacity could be confirmed. 	<p>Land at Whaddon, as identified on the policies map, is safeguarded to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review. Subject to this, the site will be allocated for a strategic housing development, including residential and community uses.</p> <p>Strategic Site Allocation Policy G2 sets out the requirements for at least 3,000 dwellings, including 30% affordable housing, to address tenure, type and size of dwellings needed within the Gloucester City area, policy criteria 1.</p> <p>Supporting text paragraph 3.4.25 sets out the quantum and nature of development for the safeguarded site, including at least 3,000 dwellings.</p>
Policy wording modifications: None		
Blackbox Planning for Taylor Wimpey UK Limited (936) Site promoter	<ul style="list-style-type: none"> All parties have been working jointly to ensure a comprehensive approach to the master planning and deliverability of the site and associated infrastructure. 	Comment noted
	<ul style="list-style-type: none"> The map presented on page 160 of the Plan is inaccurate and exaggerates the extend of non-developable land around the Daniels Brook Corridor. 	Comment noted regarding the G2 allocation map boundary. The Council will agree the correct boundaries with the site promoter on pages 155 and Page 160.
	<ul style="list-style-type: none"> The plan should indicate three points of access along the Stroud Road. A northerly access point which will serve the new model interchange is omitted, contrary to our previous submissions and the emerging masterplan for the site. 	Site access will be agreed through master planning taking into account on-site planning constraints.
	<ul style="list-style-type: none"> It is not clear what is meant by the "approved JCS review". TW interpret the approved JCS as the Reg. 18 Preferred Option stage. 	Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council's approach to identifying and assessing housing needs, including the approach to addressing unmet needs from Gloucester City.
	<ul style="list-style-type: none"> The requirement for Whaddon to be confirmed as consistent with the approved JCS review is academic and unnecessary as the evidence base firmly pointing to the necessity for Whaddon for the City's growth 	



Site Reference: Strategic Site Allocation G2 Land at Whaddon		
	<p>requirement is already readily available with the adopted JCS evidence base</p> <ul style="list-style-type: none"> The allocation of Whaddon should be made firm in the SLP and not deferred to the JCS review. The fall-back position for the Whaddon site as set out in the Reg 18 Draft Plan should be reinstated, whereby should the JCS authorities not require Whaddon, the site shall be considered as an option for meeting the district’s own needs. <ul style="list-style-type: none"> The words ‘if required’ should be deleted from 3.4.5 guiding principle 3 (page 140) and paragraph 3.4.23 (page 156) The policy should state allocated rather than safeguarded 	
	<ul style="list-style-type: none"> The evidence base provides no clear evidence of testing alternative sites for the provision of 8 plots for travelling showpeople including a methodology for site selection process. 	The JCS and GC will demonstrate these need being accommodated on site, if the site is allocated for strategic housing development.
	<ul style="list-style-type: none"> Clarification is required on the school provision with an update to be provided from Gloucestershire County Council to reflect its update methodology of pupil yield calculations and capacity assessments. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> The policy should allow a degree of flexibility on natural green space and net gain to local biodiversity and public open space. An overprovision of certain types of green space may be preferable for environment/habitat creation resulting in modest under-provision of other types of green space. 	<p>Strategic Site Allocation Policy G2 sets out the requirements for accessible natural green space providing a net gain to local biodiversity and public outdoor playing space, including on-site community building and contributions to off-site indoor sports and leisure facilities, in accordance with local standards, policy criteria 5.</p> <p>Supporting text paragraph 3.4.29 highlights the importance of providing sufficient on-site recreation opportunities to mitigate against additional visitor pressure on sensitive locations, in addition to off-site improvements where appropriate, to mitigate against the potential adverse impacts from on the Severn Estuary SAC/SPA/Ramsar and Cotswold Beechwoods SAC</p>



Site Reference: Strategic Site Allocation G2 Land at Whaddon		
		sites.
	<ul style="list-style-type: none"> Clarification required in respect of ‘sensitive landscape’ as the site is enclosed by the M5 and does not adjoin the AONB. 	Strategic Site Allocation Policy G2 sets out the requirements for development to have a layout, density and built form and character which reflects the sensitive landscape and heritage context provided by the Cotswolds AONB and local heritage assets including Whaddon Church respectively, Policy criteria 11.
	<ul style="list-style-type: none"> Stroud’s IDP needs to reflect updated requirements for county education/other infrastructure following technical analysis and testing 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> Employment uses are ancillary to local centre/community core not a large business park 	<p>Strategic Site Allocation Policy G2 sets out the requirements for a local centre, incorporating employment, local retail and community uses to meet the needs of the development, Policy criteria 7.</p> <p>Supporting text paragraph 3.4.25 sets out the quantum and nature of development for the safeguarded site, including a local centre with employment, and local retail to meet the needs of the development.</p>
Policy wording modifications: None		
Object		
Gloucestershire County Council (904)	<ul style="list-style-type: none"> The highway impact also remains a significant concern. The highway impacts arising from the allocation and mitigation required have not been provided in sufficient detail, raising concerns over their viability, deliverability and impacts on the wider network 	Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> The site has challenging sustainable accessibility issues, potentially leaving future residents dislocated and separated from Gloucester City both geographically and in terms of transport opportunities 	
	<ul style="list-style-type: none"> Overcoming the severance caused by the railway is critical 	Comment noted
	<ul style="list-style-type: none"> The underlying principles of any development in this 	This is covered in detail within the policy criteria 12 – 20.



Site Reference: Strategic Site Allocation G2 Land at Whaddon		
	<p>area needs to articulate a vision for how new neighbourhoods will be created; how new residents will travel and meet their needs, and how internalisation of trips might mitigate the need for transport interventions on the principal road network and the impact of those interventions.</p>	
	Policy wording modifications: None	
	<ul style="list-style-type: none"> Should include a further bullet requiring any future development brief to...:- determine through an initial Mineral Resource Assessment (MRA), the significance of the underlying mineral resources present within the designated MSA and the extent to which any mitigation measures will be necessary to avoid sterilisation by surface development and / or whether a strategy for the prior extraction of the mineral will be required for any future development proposals covering the relevant area of allocation G2. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Brookthorpe Parish Council (931)	<ul style="list-style-type: none"> The site is unlikely to deliver sustainable development. 	The Council considers Strategic Site Allocation G2 in accordance with the development strategy. Topic Paper: The Development Strategy October 2021 (EB4) sets out the Council's approach to identifying and assessing potential spatial strategy options and how the development strategy was selected to meet requirements, including an increased contribution from strategic urban extension sites from the sustainable intensification of development.
	<ul style="list-style-type: none"> The proposal for a 3,000-house development is greater than was previously the case having apparently been changed at the last minute. 	
	<ul style="list-style-type: none"> St Barnabas Roundabout is already over capacity and with severe physical constraints limiting the possibility of adequate improvement. 	Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> Traffic modelling reports to support the Draft Local Plan are based on an outdated figure of 2,500 dwellings at Whaddon and do not provide sufficient level of detail necessary to demonstrate that the site is capable of accommodating strategic growth of the scale envisaged. 	



Site Reference: Strategic Site Allocation G2 Land at Whaddon		
	<ul style="list-style-type: none"> The site was not discussed by members at the meeting when the Plan was adopted. This is significant in implying that members either were not made sufficiently aware of the specific issues. 	The site makes up part of the Local Plan document approved and voted for by members.
	<ul style="list-style-type: none"> What is meant by the term "safeguarding". In the planning sense safeguarding directions aim to ensure that land which has been earmarked for major infrastructure projects is protected from conflicting developments before construction starts. This is not the case here. 	<p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council's approach to identifying and assessing housing needs, including the approach to addressing unmet needs from Gloucester City.</p> <p>Supporting text paragraph 3.4.22 – 3.4.23 set out the explanation for safeguarding land at Whaddon for strategic development through identifying Strategic Site Allocation G2.</p>
	<ul style="list-style-type: none"> It is not based on any proper strategic evaluation relating to the wider sub-region, including alternative development options; nor has any adequate evaluation been carried out of the site itself and the potential impacts of development on the surrounding area. 	<p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council's approach to identifying and assessing housing needs, including the approach to addressing unmet needs from Gloucester City.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the Council's approach to identifying suitable and available strategic development land to meet wider needs through the Assessment of Strategic Development Opportunities in Parts of Gloucestershire (EB71), jointly commissioned by Gloucester City Council, Cheltenham Borough Council, Tewkesbury Borough Council, Stroud District Council and Forest of Dean District Council.</p>
	<ul style="list-style-type: none"> The Plan should be modified to provide a general statement of policy that SDC will co-operate with the JCS in the event that land is required for future housing need to identify suitable site[s] after thorough investigation of strategic options based upon comprehensive evidence. 	
	<ul style="list-style-type: none"> The JCS letter does not identify an existing housing need, but only that one might be possibly be required in future. This does not meet the test of soundness in the sense that no evidence has been produced in justification of need. 	
	<ul style="list-style-type: none"> Little evidence of any on-going constructive dialogue with the JCS and Highways in an effort to overcome the concerns about highway safety and issues surrounding the capacity of St Barnabas roundabout. 	The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan and includes Statements of Common Ground with constituent Gloucestershire local planning authorities, Gloucestershire County Council and National Highways, with particular regard to strategic



Site Reference: Strategic Site Allocation G2 Land at Whaddon		
		transport matters.
	<ul style="list-style-type: none"> The uncertainty about the ability provide the necessary supportive highway infrastructure, either in total or even in part, means that delivery of this site cannot be certain within the Plan period. 	<p>Land at Whaddon, as identified on the policies map, is safeguarded to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review. In the event that the Whaddon site is allocated, Stroud District Council and Gloucester City Council will enter into an agreement relating to the delivery of the site.</p> <p>Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.</p>
Policy wording modifications: None		
Comment		
Network Rail (3)	<ul style="list-style-type: none"> Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that they safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission. 	Comment noted
	<ul style="list-style-type: none"> There is 1 level crossing that will be affected by this site: Dursley 28 Level Crossing – Footpath Crossing 	Comment noted
	<ul style="list-style-type: none"> There does not seem to be any information within the plan which informs that an assessment and provision for any required mitigation will be needed for the level crossings identified to you 	On-site specifics, including level crossing mitigation and safety aspects to be addressed at the masterplan / planning application stage, in agreement with Network Rail.
	<ul style="list-style-type: none"> Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of any of the level crossings 	

Site Reference: Strategic Site Allocation G2 Land at Whaddon		
	listed above. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.	
Policy wording modifications: None		
Sports England (133)	<ul style="list-style-type: none"> Support the Strategic Site Allocation Policy G2, and would advise applying Sport England active design principles for the housing layout 	Comment noted
	<ul style="list-style-type: none"> Welcome paragraph 5: Accessible natural green space along the Daniels Brook providing a net gain to local biodiversity and public outdoor playing space, including on-site community building and contributions to off-site indoor sports and leisure facilities, in accordance with local standards; Local Standards is not something Paragraph 96 of the NPPF supports, but rather assessments which define what local provision is needed. The adopted Playing Pitch Strategy (PPS) does not set standards for the amount of playing field, but rather the sizes and types of pitches required depending on the size of development. Refer to Appendix 1 in the PPS. 	<p>Strategic Site Allocation Policy G2 sets out the requirements for accessible natural green space providing a net gain to local biodiversity and public outdoor playing space, including on-site community building and contributions to off-site indoor sports and leisure facilities, in accordance with local standards, policy criteria 5.</p> <p>The Council's Open Space, Green Infrastructure, Sport and Recreation Study (2019) (EB41) identifies new quantity, quality and accessibility minimum standards of provision for the District based on current and projected needs.</p> <p>The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan.</p>
	<ul style="list-style-type: none"> Consideration should be given to cross border leisure provision with Gloucester City Council. 	<p>Strategic Site Allocation Policy G2 sets out the requirements for accessible natural green space providing a net gain to local biodiversity and public outdoor playing space, including on-site community building and contributions to off-site indoor sports and leisure facilities, in accordance with local standards, policy criteria 5.</p> <p>The Council's Open Space, Green Infrastructure, Sport and Recreation Study (2019) (EB41) identifies new quantity, quality and accessibility minimum standards of provision for the District based on current and projected needs.</p> <p>The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan.</p>
Policy wording modifications: None		



Site Reference: Strategic Site Allocation G2 Land at Whaddon		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> GWT has minimal initial concerns regarding the impact of this allocation on biodiversity, but a full ecological appraisal should be undertaken. 	Comment noted
	<ul style="list-style-type: none"> GWT notes that this area is part of a corridor within the countywide ecological networks, linking the Local Wildlife Site at Robinswood Hill to the wider countryside. There is an opportunity though good design and Biodiversity Net Gain to enhance this corridor. 	On-site specifics; including substantial structural landscaping to provide a green buffer on the western, southern and eastern edges of the development and green infrastructure within the development to link where possible with existing green infrastructure and create sustainable green corridors, to be addressed at the masterplan/ planning application stage.
	<ul style="list-style-type: none"> GWT is pleased to see creation of a natural greenspace along Daniels Brook. 	Comment noted
	<ul style="list-style-type: none"> As a large strategic allocation, it is recommended that it is required to achieve the Building with Nature Benchmark or similar standards for GI. Without this requirement GWT questions whether the proposal is sound in terms of the NPPF and the Council's strategic policy on Green Infrastructure. 	Comment noted
	Policy wording modifications: None	
Historic England (813)	<ul style="list-style-type: none"> While there are no designated heritage assets within the proposed allocation, the development of this site will have a considerable impact upon the setting of the Church of St Margaret to the south-west side of Whaddon. 	Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.
	<ul style="list-style-type: none"> The broad desk-based assessment already undertaken is unfortunately insufficient to provide the necessary level of proportionate evidence and clarity required to inform the principle and form of the proposed allocation. A full and comprehensive assessment of the significance of the Church of St Margaret and its setting should take place at this stage prior to the Examination of the Local Plan. 	Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.
	<ul style="list-style-type: none"> The suggested 150 metre (approx.) landscape buffer illustrated in map G2 is unlikely to provide an 	Comment noted; maps are being updated.



Site Reference: Strategic Site Allocation G2 Land at Whaddon		
	adequate design response.	
	<ul style="list-style-type: none"> The local authority can, and probably should, consider inclusion of the Field Buildings in its local list of non-designated heritage assets. 	Comment noted
Policy wording modifications: None		
CPRE Gloucestershire (847)	<ul style="list-style-type: none"> It is depicted on the map as a safeguarded site – rather than an allocation. The SDLP makes quite specific statements about its capacity (3,000 dwellings) and timing (by 2040) which in CPRE's view prejudices the strategic choices to be made in the JCS Review – on which negligible progress appears to have been made. <ul style="list-style-type: none"> A clearer explanation in the text of the SDLP is needed about the status of land at Whaddon and a less prescriptive statement about its capacity and timing. 	<p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council's approach to identifying and assessing housing needs, including the approach to addressing unmet needs from Gloucester City.</p> <p>Supporting text paragraph 3.4.22 – 3.4.23 set out the explanation for safeguarding land at Whaddon for strategic development through identifying Strategic Site Allocation G2.</p>
	<ul style="list-style-type: none"> There should be a reconsideration of the scale of the strategic allocations in the Berkeley Vale part of the District. 	Comment not relevant to this policy.
Policy wording modifications: None		
Department of Education (871)	<ul style="list-style-type: none"> We support the safeguarding of education land within the Whaddon site allocation for this school, provided that the allocation specifically includes a Section 106 education site with independent highway access and services, that meets the department's external land requirement set out in our BB103 space standards (5.4ha), and that is capable of being brought forward separately and in advance of any housing. Subject to these prerequisites, the site allocation is capable of providing education land for the Beacon School to meet current need. 	Comment noted
Policy wording modifications: None		
Stagecoach	<ul style="list-style-type: none"> Stagecoach maintains its previous conditional support 	Comment noted



Site Reference: Strategic Site Allocation G2 Land at Whaddon		
(952)	for this proposed allocation. The site offers clear potential to be in conformity with NPPF, and could be effective in supporting the delivery of the Strategic Objectives and the Key Priorities less of this plan, and more of the Review of the JCS.	
	<ul style="list-style-type: none"> There are significant transport-related constraints on this site, we remain to be persuaded that a reliable, and relevant bus service can be operated. There is no clear evidence that buses will not be caught in chronic peak congestion between the site and A38 at St Barnabas roundabout. 	Comment noted
	<ul style="list-style-type: none"> A unified public transport corridor through the site will be frustrated by two adjoining land controls, each of which seem to be unwilling to provide a seamless north-south bus link through both controls. 	Comment noted
	<ul style="list-style-type: none"> We do not agree that sufficiently demand will rise in this area from existing and new development to warrant the delivery of direct bus services. 	Comment noted
	<ul style="list-style-type: none"> The policy G2 makes no reference to the potential impact of the development on already severe delays on all approaches to the St Barnabas junction. 	Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.
	Policy wording modifications:	
	<p>It should read :</p> <ul style="list-style-type: none"> “ A development brief framework document incorporating an indicative masterplan, one or more parameters plans, and in particular one covering movement and access shall be prepared and to be approved by the District Council before the submission of any planning application for any part of the allocated land, and will set out detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.



Site Reference: Strategic Site Allocation G2 Land at Whaddon

manner across the whole allocation. The principles therein will be treated as material considerations in development management decisions...

- 12. A layout which prioritises walking and cycling and access to public transport over the use of the private car by, for example, providing a network of internal walking and cycling **and public transport routes** that are shorter in distance than the highway network **driving routes to key local destinations**, in accordance with Manual for Streets;
- 14. Contributions and support to sustainable transport measures on the A4173 sustainable transport corridor **that ensure that cycling and public transport in particular are offered safe and free flowing conditions, including on the relevant approaches to the St Barnabas junction;**
- 16. Public transport permeability through the site, including a **direct, and seamless bus** link between Naas Lane and Grange Road and providing bus stops and shelters at appropriate locations within the development to access facilitate existing diverted and new bus services and **sufficient financial** contributions to enhance bus service frequencies to key destinations including first Gloucester, and **then Stroud, on a phased basis.** and Stonehouse;
- 22. Phasing arrangements to ensure that **public transport**, employment, retail and community provision is made in a timely manner."



Site Reference: Strategic Site Allocation G2 Land at Whaddon		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		
894	<ul style="list-style-type: none"> Specific statements are made about its capacity and timing which prejudices the strategic choices to be made in the JCS Review. 	Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council's approach to identifying and assessing housing needs, including the approach to addressing unmet needs from Gloucester City.
894	<ul style="list-style-type: none"> The term safeguarded, is employed in relation to land taken out of the Green Belt and safeguarded from development in the current plan period to be first in line to meet development requirements in the next. Land at Whaddon is not in the Green Belt. 	Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the Council's approach to identifying suitable and available strategic development land to meet wider needs through the
44	<ul style="list-style-type: none"> Would lead to development creep 	Assessment of Strategic Development Opportunities in Parts of Gloucestershire (EB71), jointly commissioned by Gloucester City Council, Cheltenham Borough Council, Tewkesbury Borough Council, Stroud District Council and Forest of Dean District Council.
489	<ul style="list-style-type: none"> Gloucester's housing needs should be met north of the City closer to the economic hub 	
489	<ul style="list-style-type: none"> Stroud's housing growth should be focussed further toward the south of Gloucester at Hardwicke and Whaddon in addition to the Hunts Grove extension. 	Supporting text paragraph 3.4.22 – 3.4.23 set out the explanation for safeguarding land at Whaddon for strategic development through identifying Strategic Site Allocation G2.
365	<ul style="list-style-type: none"> The allocation should be placed within a sustainable spatial framework context, agreed with Gloucester City, that would shape land owner and developer expectations. 	
394	<ul style="list-style-type: none"> The Stroud inclusion of the G2 Whaddon site is premature as the JCS Plan Review has not been completed 	
192	<ul style="list-style-type: none"> Too many houses. 	The Council considers Strategic Site Allocation G2 in accordance with the development strategy. Topic Paper: The Development Strategy October 2021 (EB4) sets out the Council's approach to identifying and assessing potential spatial strategy options and how the development strategy was



Site Reference: Strategic Site Allocation G2 Land at Whaddon		
		selected to meet requirements, including an increased contribution from strategic urban extension sites from the sustainable intensification of development.
Settlement hierarchy and place making		
646	<ul style="list-style-type: none"> Developments need to be sensitive not to damage the local character of the area. 	<p>Strategic Site Allocation Policy G2 sets out the requirements for the layout, density and built form and character to reflect the sensitive landscape and heritage context provided by the Cotswolds AONB and local heritage assets, policy criteria 10.</p> <p>Supporting text paragraph 3.4.28 highlights the envisaged development as a series of neighbourhoods linking seamlessly with the south of Gloucester at Tuffley and reflecting its edge of Gloucester location.</p>
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
109	<ul style="list-style-type: none"> Development should include a “ room to grow” extension of the proposed show people site to benefit families with close ties and who tend to live in close proximity through the generations. 	This will be addressed at the time Gloucester City or the JCS allocate the site.
192	<ul style="list-style-type: none"> Not enough affordable homes. 	Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 4 or more dwellings within designated rural areas, including Brookthorpe-with-Whaddon CP. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
Community facilities		
21, 31, 49, 57, 125	<ul style="list-style-type: none"> Local schools will become over-subscribed. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
28, 32, 51	<ul style="list-style-type: none"> Very limited services in local area 	
21	<ul style="list-style-type: none"> Impact on existing local amenities 	



Site Reference: Strategic Site Allocation G2 Land at Whaddon		
788	<ul style="list-style-type: none"> There needs substantially greater cooperation between Gloucester and Stroud to see Tuffley, Quedgeley, Hunts Grove, Kingsway and Hardwicke as single urban area and to plan community services at this level. 	The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan.
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
646	<ul style="list-style-type: none"> Plans need to be made to ensure all developments also provide jobs for the residents. 	Comment noted
178	<ul style="list-style-type: none"> Close to major job opportunities in Gloucester and to Gloucestershire vision for business development between Gloucester and Cheltenham. 	Comment noted
358	<ul style="list-style-type: none"> Close to county council growth /employment zone 	Comment noted
Retail and town centres		
No comments received		
Travel, transport and highways		
14	<ul style="list-style-type: none"> Good transport links and an existing road network. Easily adapted to facilitate the development. 	Comment noted
23, 24, 25, 27, 28, 31, 33, 37, 38, 41, 45, 46, 47, 49, 51, 58, 60, 65, 108, 132, 394	<ul style="list-style-type: none"> Poor roads and transport links cannot support additional housing. 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>On-site specifics, including pedestrian, cycle and vehicular site access, highway safety, to be addressed at the masterplan / planning application stage, in agreement with Gloucestershire Highways. Delivery Policy E112 requires development proposals that are likely to have a significant impact on the local transport network to submit a Transport Assessment, as well as a Travel Plan.</p> <p>The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production</p>



Site Reference: Strategic Site Allocation G2 Land at Whaddon		
		of the Stroud Local Plan and includes Statements of Common Ground with constituent Gloucestershire local planning authorities, Gloucestershire County Council and National Highways, with particular regard to strategic transport matters.
21, 22, 23, 24, 25, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 39, 41, 42, 44, 51, 57, 58, 60, 61, 65, 113, 117, 122, 127, 869	<ul style="list-style-type: none"> Current traffic issues (St Barnabas Roundabout, Tuffley Lane, Stroud Road, Reservoir Road and Grange Road) 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>On-site specifics, including pedestrian, cycle and vehicular site access, highway safety, to be addressed at the masterplan / planning application stage, in agreement with Gloucestershire Highways. Delivery Policy E112 requires development proposals that are likely to have a significant impact on the local transport network to submit a Transport Assessment, as well as a Travel Plan.</p>
394	<ul style="list-style-type: none"> St Barnabas traffic assessments have been for 2500 and 2700 houses not the actual 3000 houses or more realistically 3560 houses plus the nearby developments 	
113	<ul style="list-style-type: none"> A Highways Impact Study, looking at all development in Gloucester / Stroud that will impact the local highway network, should be conducted. 	The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan and includes Statements of Common Ground with constituent Gloucestershire local planning authorities, Gloucestershire County Council and National Highways, with particular regard to strategic transport matters.
28	<ul style="list-style-type: none"> Cycle routes are non-existent 	
21, 28	<ul style="list-style-type: none"> No current bus routes serve Grange Road 	
709	<ul style="list-style-type: none"> Do not allow any hard non-porous standing, parking areas for vehicles, including private drives. 	
39	<ul style="list-style-type: none"> A single lane road under a bridge isn't viable to handle the amount of traffic that will be created 	
910	<ul style="list-style-type: none"> Fails to consider optimum bus/bike/foot networks, and does not link effectively to either adjacent sites across the railway or to the proposed new station. 	
29	<ul style="list-style-type: none"> Provision for access to the site has not been considered properly. 	
113	<ul style="list-style-type: none"> JCS states that In advance of any formal allocation SDC and Gloucestershire Highways are comfortable that the additional traffic generated by the site on St 	



Site Reference: Strategic Site Allocation G2 Land at Whaddon		
	Barnabas Roundabout, and the wider highway network can be appropriately mitigated	
113	<ul style="list-style-type: none"> Particular problems for road users with entry and exit to the proposed development area due to location between the railway line and the motorway 	
Infrastructure		
646	<ul style="list-style-type: none"> All developments must come in tandem with suitable improvements to local infrastructure and services to ensure these are sufficient. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course. All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP (EB69).
55	<ul style="list-style-type: none"> Impact on sewer system 	
394	<ul style="list-style-type: none"> The lack of infrastructure makes it an impractical site 	
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
34	<ul style="list-style-type: none"> Huge volume of water collects on here as functional flood plain for Tuffley. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
32, 33, 39, 41, 42, 57	<ul style="list-style-type: none"> Development will add to current flooding issues around Grange road, Whaddon Way, Harwell Close. 	
709	<ul style="list-style-type: none"> Do not allow any hard non-porous standing, parking areas for vehicles, including private drives. 	
41, 43, 44, 46, 49, 58, 122, 132	<ul style="list-style-type: none"> Loss of greenfield/belt land. 	The Council considers Strategic site allocation G2 in accordance with the development strategy. Topic Paper: The Development Strategy October 2021 (EB4) sets out the Council's approach to identifying and assessing potential spatial strategy options and how the development strategy was selected to meet requirements, informed by Sustainability Appraisal (CD3).
57	<ul style="list-style-type: none"> Detrimental to wildlife, trees, plants and the whole supporting ecology. 	The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.



Site Reference: Strategic Site Allocation G2 Land at Whaddon		
646	<ul style="list-style-type: none"> Developments need to be to the highest possible environmental standards to reduce environmental damage and significant rewilding needs to be carried out to offset the impacts of developments. 	Core Policy CP5 sets out the environmental development principles for strategic sites, including sustainable construction requirements, to ensure high quality, low impact development.
Landscape		
304	<ul style="list-style-type: none"> Will add to recreation pressures on the Haresfield Beacon in the Cotswolds AONB 	Comment noted
Historic environment		
No comments received		
Policy wording modifications:		
304	<ul style="list-style-type: none"> add: "Appropriate mitigation measures or replacement green infrastructure to safeguard the AONB from development pressure". 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		

PS33

Site Reference: Local Sites Allocation Policy PS33 Northwest of Berkeley		
Number of representations: 217	Support: 22	Object: 191
Stakeholders	Comments	Stroud District Council Response
Support		
Berkeley Town Council (477)	<ul style="list-style-type: none"> • Adjacent to settlement development limits; <ul style="list-style-type: none"> ○ Within easy walking distance to local services ○ Close to bus stops 	Comment noted
	<ul style="list-style-type: none"> • Mixed tenure development including 30% affordable homes. 	Comment noted
	<ul style="list-style-type: none"> • Access onto B4066 will not impact the roundabout. 	Comment noted
	<ul style="list-style-type: none"> • Includes flood mitigation measures: <ul style="list-style-type: none"> ○ Landscaped wildlife area ○ Housing only on higher part of site 	Comment noted
	Policy wording modifications: None	
SDC Cllr Haydn Jones (500)	<ul style="list-style-type: none"> • Can be accommodated without undue landscape impact. 	Comment noted
	<ul style="list-style-type: none"> • Fills a gap between existing built form and the transport network. 	Comment noted
	<ul style="list-style-type: none"> • Acceptable access to services nearby. 	Comment noted
	<ul style="list-style-type: none"> • Example of the slightly dispersed strategy favoured by residents in previous phases of consultation. 	Comment noted
	<ul style="list-style-type: none"> • Support local site allocation policy provisions and criteria for development set out in para 3.5.6. 	Comment noted
	<ul style="list-style-type: none"> • Highlight ongoing application with GCC , as PROW authority, to confirm higher rights for adjoining public footpath. 	Comment noted
Policy wording modifications: None		
Avison Young for Redrow Homes Ltd (945) Site promoter	<ul style="list-style-type: none"> • Current planning application S.20/0100/FUL: <ul style="list-style-type: none"> ○ 107 dwellings ○ Enhanced site boundaries to the north, east and south. ○ New access to the B4066 from the northern 	Comment noted



Site Reference: Local Sites Allocation Policy PS33 Northwest of Berkeley		
	<p>boundary.</p> <ul style="list-style-type: none"> ○ Substantial landscaped park on the western portion of the site incorporating the watercourse. ○ Ecological mitigation and enhancement measures agreed with Natural England. ○ New and enhanced footpath and cycle links. ○ No EA flood risk objection. ○ 30% affordable housing provision. 	
	<ul style="list-style-type: none"> ● Welcome flexibility for approximately 110 dwellings. 	Comment noted
	<ul style="list-style-type: none"> ● Policy requirement for a masterplan is surplus to requirement.: <ul style="list-style-type: none"> ○ Small scale site. ○ Deliverable in single phase. ● Submitted planning application S.20/0100/FUL meets aspirations cited within the allocation policy text. 	By having an indicative masterplan approved, the Council will be able to ensure the site is will be developed in an integrated and co-ordinated manner. This is not an onerous step and will ensure good quality planning and delivery.
	Policy wording modifications:	
	<ul style="list-style-type: none"> ● Remove masterplan requirement from proposed allocation wording. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Object		
Walking Berkeley Vale's Endangered Byways (731)	<ul style="list-style-type: none"> ● Scale of development proposed between Berkeley and Sharpness. 	The Council considers the proposed allocations between Berkeley and Sharpness to be of appropriate scale and size. Justification for the role of Berkeley and Sharpness in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).
	Policy wording modifications: None	

Site Reference: Local Sites Allocation Policy PS33 Northwest of Berkeley		
Gloucestershire Ramblers, South Cotswold Group (793)	<ul style="list-style-type: none"> Impact on public footpath north of the site: <ul style="list-style-type: none"> Currently a green path towards Sanigar. Potential change from a rural experience to walking through an urban environment. Risk of being extinguished. New and enhanced footpath and cycle links to Berkeley may be beneficial. <ul style="list-style-type: none"> Cycles should be treated as vehicles, separated from pedestrians and adequate passing width provided in accordance with Government guidance. 	On-site specifics, including incorporating the existing Public Right of Way, footpaths and cycle ways to be addressed at the masterplan/ planning application stage in agreement with Gloucestershire Highways.
	Policy wording modifications: None	
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> The site includes an area of woodland in the north west corner which forms a core part of the Nature Recovery Network (NRN): <ul style="list-style-type: none"> The Masterplan must retain this area of woodland and seek to enhance its connectivity to the rest of the woodland network through Green Infrastructure design. 	Open space provision in accordance with local standards will be provided in accessible locations within the site, including along the western edge of the site where a landscaped park will include flood risk attenuation and enhancements to support local biodiversity particularly connections to The Fishers woodland north of the site.
	<ul style="list-style-type: none"> A full ecological appraisal should be undertaken, including an EIA for impacts on the SPA, SAC and RAMSAR sites. 	Comment noted
	<ul style="list-style-type: none"> Requires the provision of a significant new area of Suitable Alternative Natural Greenspace (SANG) within the cluster, which ideally would be delivered strategically by combining contributions from allocations. <ul style="list-style-type: none"> Will need to evidence that any SANG has the qualities and features to make it a desirable alternative to sensitive biodiversity sites and land functionally linked to them. 	Comment noted
	Policy wording modifications: None	



Site Reference: Local Sites Allocation Policy PS33 Northwest of Berkeley		
Environment Agency (933)	<ul style="list-style-type: none"> Site allocation policy includes incorporating the existing watercourse in a landscaped park along the western boundary: <ul style="list-style-type: none"> Need to ensure watercourse given space Need to ensure sensitive enhancement where appropriate 	Open space provision in accordance with local standards will be provided in accessible locations within the site, including along the western edge of the site where a landscaped park will include flood risk attenuation and enhancements to support local biodiversity particularly connections to The Fishers woodland north of the site.
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
9, 12, 120, 230, 279, 292, 363, 368, 639, 651, 795	<ul style="list-style-type: none"> Object to greenfield development: <ul style="list-style-type: none"> Loss of farmland No justification provided for loss of good to moderate agricultural land. Impact on biodiversity 	<p>Sites that are on greenfield land classed as high quality agricultural land (Grades 1, 2 or 3a) are rated red, as having a significant negative (--) effect, for efficiency in land use and protection of soil quality regardless of size. Sites are allocated having regard to Sustainability Appraisal across 17 SA objectives; this is a balanced judgement taking all objectives into consideration, SA Report Appendix 4 (CD3b).</p> <p>The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.</p>
145, 146, 561, 795	<ul style="list-style-type: none"> Alternative brownfield sites available within Stroud District. 	Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
Strategic growth and development locations		
695	<ul style="list-style-type: none"> Sustainable development 	Comment noted
276, 430, 435, 556	<ul style="list-style-type: none"> Scale and location make good use of existing infrastructure. 	Comment noted
1, 5, 70, 103, 118, 119, 123, 128, 129,	<ul style="list-style-type: none"> Scale of development and cumulative impacts from PS36 and other allocations within the Berkeley cluster 	The Council considers the proposed allocations between Berkeley and Sharpness to be of appropriate scale and size. Justification for the role of



Site Reference: Local Sites Allocation Policy PS33 Northwest of Berkeley		
130, 139, 140, 151, 152, 158, 164, 175, 234, 235, 238, 241, 255, 262, 263, 270, 277, 281, 282, 283, 306, 307, 325, 329, 349, 356, 361, 364, 370, 387, 406, 413, 433, 448, 472, 473, 528, 530, 547, 615, 617, 620, 628, 629, 646, 704, 720, 738, 741, 795, 800, 804	<p>disproportionate to local area.</p> <ul style="list-style-type: none"> ○ Support the position of BaSRAG 	Berkeley and Sharpness in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).
160, 561	<ul style="list-style-type: none"> • Not supported by the local community. 	Comment noted
734	<ul style="list-style-type: none"> • Unsustainable location. <ul style="list-style-type: none"> ○ More suitable sites closer to A38. 	The Council considers PS33 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
Settlement hierarchy and place making		
197, 430,	<ul style="list-style-type: none"> • Natural rounding and infilling of the Berkeley settlement; <ul style="list-style-type: none"> ○ Contained by ring road. 	Comment noted
Infrastructure and developer contributions		
336	<ul style="list-style-type: none"> • High cost of open space and GI provision: <ul style="list-style-type: none"> ○ Impact on site viability. ○ Potential additional mitigation costs for adverse effects on the Severn Estuary SAC/SPA/Ramsar site 	The Council's Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
Policy wording modifications: None		



Site Reference: Local Sites Allocation Policy PS33 Northwest of Berkeley		
Homes and Communities		
Housing		
131, 695, 802	<ul style="list-style-type: none"> Support some housing within the Berkeley and Sharpness area to meet local needs. 	Comment noted
192, 271, 372, 515	<ul style="list-style-type: none"> Too much housing 	The Council considers the proposed allocations between Berkeley and Sharpness to be of appropriate scale and size. Justification for the role of Berkeley and Sharpness in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).
192	<ul style="list-style-type: none"> Delivery of affordable housing 	Outside the AONB or designated rural parishes, Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
247	<ul style="list-style-type: none"> How will new housing meet Carbon neutral 2030 and 2050 targets? 	New Core Policy DCP1 Delivering Carbon Neutral by 2030 sets out the overarching requirements for all new development, to support the Council's target to become Carbon Neutral by 2030.
Community facilities		
358, 573, 714, 767, 802	<ul style="list-style-type: none"> Good access to existing services and facilities. 	Comment noted
218, 734	<ul style="list-style-type: none"> Lack of local facilities within walking distance. Inadequate local services and facilities. 	High quality and accessible walking and cycling routes within the site will link with and enhance where necessary the existing network. Topic Paper – Transport October 2021 ((EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices.
Policy wording modifications: None		



Site Reference: Local Sites Allocation Policy PS33 Northwest of Berkeley		
Economy and Infrastructure		
Employment		
No comments received		
Retail and town centres		
145, 270,	<ul style="list-style-type: none"> Impact on parking in Berkeley town centre. 	High quality and accessible walking and cycling routes within the site will link with and enhance where necessary the existing network.
Travel, transport and highways		
276, 802	<ul style="list-style-type: none"> Support access from B4066. 	Comment noted
276	<ul style="list-style-type: none"> Support improvements to local footpaths and cycle ways. 	Comment noted
83, 126, 247, 423, 652, 734, 746, 759, 787	<ul style="list-style-type: none"> Inadequate local road infrastructure to cope with additional traffic: <ul style="list-style-type: none"> Alkington Road A38 Heathfield junction B4066 Wider road network Impact on highway safety of pedestrians, cyclists and road users. Necessary road improvements: <ul style="list-style-type: none"> Complete Berkeley bypass 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.</p>
83, 285		
159, 233, 652, 700	<ul style="list-style-type: none"> Unsafe access onto B4066: <ul style="list-style-type: none"> Busy main road. Heavy lorry traffic. Accident black spot. No speed limit/ traffic lights planned. Impact on free flow of traffic on the bypass. <ul style="list-style-type: none"> 	On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.
145, 247, 423	<ul style="list-style-type: none"> Impact on existing footpath and cycleways: <ul style="list-style-type: none"> Impact on bridle path adjacent to the site. Not identified on site allocation policy map. How will improvements integrate with existing network? 	On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.



Site Reference: Local Sites Allocation Policy PS33 Northwest of Berkeley		
	<ul style="list-style-type: none"> ○ Segregation of pedestrians, cyclists and other road users? ○ Lack of sufficient pedestrian access to Berkeley Primary School. 	
700	<ul style="list-style-type: none"> ● Lack of public transport. 	Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.
Infrastructure		
80, 121, 490	<ul style="list-style-type: none"> ● Infrastructure inadequate to cope with additional development 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
223	<ul style="list-style-type: none"> ● Requires clear plans for transport and community infrastructure. 	Topic Paper – Transport October 2021 ((EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices.
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
197, 573, 714, 120, 137, 220, 241, 247, 288, 334, 363, 368, 552, 553, 651, 709, 711, 721, 728, 800	<ul style="list-style-type: none"> ● Flood risk concerns: <ul style="list-style-type: none"> ○ Within active flood plain. ○ Impact on existing residential properties. ○ Land regularly subject to standing water. ○ Fails to take account of future increased flood risk. ○ Lack of flood risk mitigation proposals. ○ No more non porous drives or parking areas. 	<p>All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.</p> <p>All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP (EB69).</p>
767	<ul style="list-style-type: none"> ● Provision of wildlife area will address flooding issues in north west corner of the site. 	On-site specifics; including strategic landscaping to provide accessible open space, minimise landscape impacts and safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.
193, 230, 370, 734	<ul style="list-style-type: none"> ● Impact and loss of wildlife and habitats: <ul style="list-style-type: none"> ○ Impact on Severn Estuary SAC, SPA and Ramsar site including increased recreational pressure. ○ Proposed wildlife area too small. 	The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows



Site Reference: Local Sites Allocation Policy PS33 Northwest of Berkeley		
		as they form a key component of local ecological networks and ecosystem services.
Landscape		
193, 700	<ul style="list-style-type: none"> • Visual impact: <ul style="list-style-type: none"> ○ Prominent site in the landscape from Lydney and the Forest of Dean. ○ Impact on rural setting of Berkeley. 	On-site specifics; including strategic landscaping to provide accessible open space, minimise landscape impacts and safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		





**BER
016/17**

Site Reference: Local Sites Allocation Policy BER016/17 Land at Lynch Road, Berkeley		
Number of representations: 220	Support: 26	Object: 191
Stakeholders	Comments	Stroud District Council Response
Support		
SDC Cllr Haydn Jones (500)	<ul style="list-style-type: none"> • Example of suitable development: <ul style="list-style-type: none"> ○ Limited size ○ Acceptable access to services ○ Reuses previously developed land ○ Does not impinge unacceptably on valuable farmland ○ Community support for dispersed housing 	Comment noted
Policy wording modifications: None		
Rackham Planning Ltd for Prestige Developments (674) Site promoter	<ul style="list-style-type: none"> • Site within single ownership; includes redevelopment of the complex of buildings and adjacent land. 	Comment noted
	<ul style="list-style-type: none"> • Reports being prepared on highways, flooding, ecology and ground investigation to support allocation. 	Comment noted
	<ul style="list-style-type: none"> • Sustainable location: <ul style="list-style-type: none"> ○ Adjacent to settlement boundary ○ Close to a good range of local services, facilities and public transport. 	Comment noted
Policy wording modifications: None		
Object		
Berkeley Town Council (477)	<ul style="list-style-type: none"> • Dangerous access onto Lynch Road: <ul style="list-style-type: none"> ○ Poor visibility ○ Lack of highway assessment 	On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.
	<ul style="list-style-type: none"> • Additional traffic will add to problems on Canonbury Hill. 	On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.
	<ul style="list-style-type: none"> • No bus service to Lynch Road. 	Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.
	<ul style="list-style-type: none"> • Pollution of watercourse east of site from surface 	Surface run-off will be managed through design at the planning application



Site Reference: Local Sites Allocation Policy BER016/17 Land at Lynch Road, Berkeley		
	water run-off.	stage.
	<ul style="list-style-type: none"> Flood risk: <ul style="list-style-type: none"> Eastern part of the site within Flood Zone 3. Recent flooding on Lynch Road caused by inadequate drainage. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
	<ul style="list-style-type: none"> Visual impact on Sarah's Field Berkeley Town Council wildlife area 	On-site specifics; including strategic landscaping to provide accessible open space, minimise landscape impacts and safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.
	<ul style="list-style-type: none"> Japanese knotweed present on site. 	Comment noted
Policy wording modifications: None		
Walking Berkeley Vale's Endangered Byways (731)	<ul style="list-style-type: none"> Flood risk: <ul style="list-style-type: none"> Lynch Road subject to flooding. EA flood risk maps under review. Presentation of flood risk evidence. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
Policy wording modifications: None		
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> Situated in low priority areas for habitat enhancement in the Nature Recovery Network. 	Comment noted
	<ul style="list-style-type: none"> No records of features of high wildlife value in this location. 	Comment noted
	<ul style="list-style-type: none"> A full ecological appraisal should be undertaken, including an EIA for impacts on the SPA, SAC and RAMSAR sites. 	Comment noted
	<ul style="list-style-type: none"> Requires the provision of a significant new area of Suitable Alternative Natural Greenspace (SANG) within the cluster, which ideally would be delivered strategically by combining contributions from allocations. Will need to evidence that any SANG has the qualities and features to make it a desirable alternative to sensitive biodiversity sites and land functionally linked to them. 	Comment noted
Policy wording modifications: None		



Site Reference: Local Sites Allocation Policy BER016/17 Land at Lynch Road, Berkeley		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
197, 256	<ul style="list-style-type: none"> Includes an amount of brownfield redevelopment. 	Comment noted
9, 261, 265, 279, 282, 283, 336, 363, 368, 552, 553, 651, 795	<ul style="list-style-type: none"> Object to greenfield development: <ul style="list-style-type: none"> Contrary to climate emergency agenda. Loss of biodiversity Loss of natural flood mitigation and impact on flood risk. Loss of farmland. Loss of amenity space Loss of potential climate mitigation resource for renewable energy, carbon sinks, flood management, biodiversity mitigation. 	Sites that are on greenfield land classed as high quality agricultural land (Grades 1, 2 or 3a) are rated red, as having a significant negative (--) effect, for efficiency in land use and protection of soil quality regardless of size. Sites are allocated having regard to Sustainability Appraisal across 17 SA objectives; this is a balanced judgement taking all objectives into consideration, SA Report Appendix 4 (CD3b).
213	<ul style="list-style-type: none"> Additional traffic conflicts with carbon neutral targets. 	Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.
Strategic growth and development locations		
695	<ul style="list-style-type: none"> Sustainable development. 	Comment noted
256, 276, 390, 430, 435, 591, 89, 794,	<ul style="list-style-type: none"> Appropriate scale to local area. <ul style="list-style-type: none"> Small/ moderate scale 	Comment noted
1, 50, 101, 118, 119, 120, 121, 123, 128, 129, 130, 140, 151, 152, 160, 164, 175, 213, 218, 219, 234, 235, 241, 255, 262, 270, 271, 277, 279, 281, 282, 283, 325, 329, 349, 354, 356, 361, 364, 366, 372,	<ul style="list-style-type: none"> Scale of development and cumulative impacts from PS36 and other allocations within the Berkeley cluster disproportionate to local area. <ul style="list-style-type: none"> Support the position of BaSRAG 	The Council considers the proposed allocations between Berkeley and Sharpness to be of appropriate scale and size. Justification for the role of Berkeley and Sharpness in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).



Site Reference: Local Sites Allocation Policy BER016/17 Land at Lynch Road, Berkeley		
387, 406, 413, 433, 448, 472, 473, 513, 528, 615, 620, 628, 646, 678, 704, 774, 787, 800, 804		
101, 571, 784	<ul style="list-style-type: none"> Inappropriate location due to Health and safety implications: <ul style="list-style-type: none"> proximity to ammonium nitrate storage at Sharpness Docks. Japanese Knott Weed on western part of site. 	The UK HSE have not got concerns with the allocation.
255, 523, 530, 561, 567, 767	<ul style="list-style-type: none"> Concerns over Plan making process, including: <ul style="list-style-type: none"> Issues raised by many residents have not been addressed or taken into account Concerns over consultation process. Presentation and publication of evidence base concerns. Timing of Full Council. Site came through late in the Plan process and not properly assessed for highways, flooding or environmental impacts. 	<p>The Statement of Community Involvement March 2020 (EB2) sets out how Stroud District Council has informed, engaged and consulted people throughout the plan preparation process.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including the results of public consultation.</p>
Settlement hierarchy and place making		
197	<ul style="list-style-type: none"> Sympathetic rounding off of the Berkeley settlement. 	Comment noted
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
5, 131, 276, 284, 695	<ul style="list-style-type: none"> Support some housing within the Berkeley and Sharpness area to meet local needs. 	Comment noted
276	<ul style="list-style-type: none"> Support affordable housing provision 	Comment noted
247, 700	<ul style="list-style-type: none"> Development should include: 	The Council considers Local Site Allocation BER016/17 suitable for



Site Reference: Local Sites Allocation Policy BER016/17 Land at Lynch Road, Berkeley		
	<ul style="list-style-type: none"> ○ Local housing design ○ Suitable house and garden space ○ Electric vehicle charging ○ Bin storage ○ Cycle storage ○ How will Carbon neutral 2030 and 2050 targets be met? 	<p>development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>New Core Policy DCP1 Delivering Carbon Neutral by 2030 sets out the overarching requirements for all new development, to support the Council’s target to become Carbon Neutral by 2030. All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.</p> <p>Core Policy CP8 New housing development sets out requirements for good design to ensure development is appropriate in townscape, local environment, character and amenity terms.</p> <p>On-site specifics; including safeguarding and enhancing local biodiversity, bin storage, cycle storage to be addressed at the masterplan/ planning application stage.</p>
48, 192	<ul style="list-style-type: none"> ● Too much housing 	<p>The Council considers the proposed allocation to be of appropriate scale and size for this Tier 2 settlement. Justification for the role of Berkeley in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).</p>
192	<ul style="list-style-type: none"> ● Delivery of affordable housing 	<p>Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 4 or more dwellings within designated rural areas, including Hamfallow CP. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.</p>
Community facilities		
256, 276, 284, 358, 573, 700, 714	<ul style="list-style-type: none"> ● Good access to existing services and facilities. 	Comment noted
Policy wording modifications: None		



Site Reference: Local Sites Allocation Policy BER016/17 Land at Lynch Road, Berkeley		
Economy and Infrastructure		
Employment		
358	<ul style="list-style-type: none"> • Close to employment 	Comment noted
Retail and town centres		
No comments received		
Travel, transport and highways		
197	<ul style="list-style-type: none"> • Will require improvements to local road network. 	Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.
276	<ul style="list-style-type: none"> • Good access to footpaths and cycleways 	Comment Noted
12, 83, 126, 213, 285, 336, 363, 368, 523, 556, 567, 651, 678, 697, 746, 759, 767, 800	<ul style="list-style-type: none"> • Inadequate local road infrastructure to cope with additional traffic: <ul style="list-style-type: none"> ○ Lynch Road ○ Alkington Lane ○ B4066 ○ Ham Lane ○ Danger to highway safety for pedestrians, cyclists and road users. 	<p>Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.</p> <p>On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.</p>
12, 83	<ul style="list-style-type: none"> • Necessary road improvements: <ul style="list-style-type: none"> ○ Link A38 to existing Sharpness ring road. ○ Complete Berkeley bypass 	<p>Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.</p> <p>On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.</p>
247, 459, 523, 556, 567, 571, 678, 767, 784	<ul style="list-style-type: none"> • Increased traffic through Berkeley town centre: <ul style="list-style-type: none"> ○ Concern re free flow of traffic along Lynch Road and Canonbury Street due to on street parking. ○ Traffic congestion on Canonbury Hill. 	<p>Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.</p> <p>On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.</p> <p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p>



Site Reference: Local Sites Allocation Policy BER016/17 Land at Lynch Road, Berkeley		
523	<ul style="list-style-type: none"> Will limit any future solution to traffic to the Power Station area bypassing Berkeley town centre. 	<p>Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.</p> <p>On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.</p>
363, 368, 571, 651, 767, 784	<ul style="list-style-type: none"> Unsafe site access <ul style="list-style-type: none"> Poor visibility On street parking Road speed Refusal reason for previous planning application for development on the site 	<p>Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.</p> <p>On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.</p>
423	<ul style="list-style-type: none"> Inadequate pedestrian access to Berkeley Primary School: <ul style="list-style-type: none"> Requires a new all-weather route between the site and Fitzhardinge Way 	<p>On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.</p>
423, 526, 571, 767, 784	<ul style="list-style-type: none"> Lack of public transport <ul style="list-style-type: none"> Within wider local area No bus service to Lynch Road Development will be car dependent. 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p>
Infrastructure		
80, 137, 249, 263, 353, 490, 542	<ul style="list-style-type: none"> Infrastructure inadequate to cope with additional development 	<p>Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.</p>
223	<ul style="list-style-type: none"> Requires clear plans for transport and community infrastructure. 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p>
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
413, 523, 556, 567, 571, 678, 767, 784, 802	<ul style="list-style-type: none"> Impact on Sarah’s Field community greenspace <ul style="list-style-type: none"> Community wildlife and recreation area. Not identified on the allocation policy map. Impact on wildlife including protected species. 	<p>The Council considers Local Site Allocation BER016/17 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including</p>



Site Reference: Local Sites Allocation Policy BER016/17 Land at Lynch Road, Berkeley		
	<ul style="list-style-type: none"> ○ Natural water meadow. ○ Potential increased flood risk, loss and damage to valuable community amenity. ○ Visual impact on amenity space. ○ Potential pollution of brook from surface water run-off. 	<p>landscape and visual impacts.</p> <p>The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.</p>
137, 193, 523, 542, 552, 567, 651	<ul style="list-style-type: none"> ● Loss of wildlife: <ul style="list-style-type: none"> ○ Impact on biodiversity ○ Detrimental to the wildlife corridor running through the little vale. 	<p>The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.</p>
197, 256, 430, 700, 714	<ul style="list-style-type: none"> ● Support subject to careful consideration of local flood risk: 	<p>All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.</p>
123, 207, 213, 220, 247, 523, 542, 552, 553, 556, 567, 571, 573, 575, 578, 651, 709, 711, 721, 767, 782, 784, 800	<ul style="list-style-type: none"> ● Flood risk concerns: <ul style="list-style-type: none"> ○ Within a flood risk area subject to flooding. ○ Adjacent to an EA flood alleviation area. ○ Impact on existing properties on James Orchard. ○ Impact on existing properties on Lynch Road, between Park View and Bevans Hill. ○ Additional run-off from new development increasing flood risk. ○ Increased flood risk from climate change. ○ Impact on the Pill sluice gates from increased flood risk. ○ Will exacerbate flooding over a wider area. ○ Late publication of Stroud Level 2 SFRA on 20 May 2021 after Full Council vote on 30 April 2021. ○ SFRA based on 2016 guidance for flood risk 	<p>All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.</p> <p>All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP (EB69).</p>



Site Reference: Local Sites Allocation Policy BER016/17 Land at Lynch Road, Berkeley		
	<ul style="list-style-type: none"> ○ modelling not updated 2021 guidance. ○ Lack of sufficient oversight of the flood risk maps. ○ No provision for drainage improvements. 	
361	<ul style="list-style-type: none"> ● Recreational impacts/ overuse of natural spaces. 	On-site specifics; including strategic landscaping to provide accessible open space, minimise landscape impacts and safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.
782	<ul style="list-style-type: none"> ● Impact on foul water drainage and sewerage provision for existing properties. 	All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP (EB69).
459	<ul style="list-style-type: none"> ● Impact on residential amenity 	Core Policy CP8 New housing development sets out requirements for good design to ensure development is appropriate in townscape, local environment, character and amenity terms.
571, 784	<ul style="list-style-type: none"> ● Potential pollution of watercourse east of the site from run-off. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
Landscape		
193, 336	<ul style="list-style-type: none"> ● Visual impact ● Detrimental impact on natural landscape and Sarah's Field. 	The Council considers Local Site Allocation BER016/17 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including landscape and visual impacts.
Historic environment		
238, 287, 561	<ul style="list-style-type: none"> ● Impact on historic Berkeley as a medieval market town 	Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		



PS34

Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks			
Number of representations: 270		Support: 34	Object: 230
Stakeholders		Comments	Stroud District Council Response
Support			
Sport England (133)	<ul style="list-style-type: none"> Support the aims set out in paragraph 3.5.9 to utilise the deep basin for water-based recreation and sports. 	Comment noted	
	<ul style="list-style-type: none"> The housing layout should be designed in accordance with active design principles. 	Comment noted	
	<ul style="list-style-type: none"> Suitable additional playing fields and other sports provision, or enhancements to existing indoor and outdoor facilities, to meet the needs of new residents should be achieved through s106/ CIL contributions from the development. 	Comment noted	
Policy wording modifications: None			
The Canal & River Trust (496) Site promoter	<ul style="list-style-type: none"> The Trust fully supports the continued allocation of its land at Sharpness Docks for a mixed use development under draft policy PS34, carrying over the existing allocation in the adopted Local Plan (adopted 2015) under Policy SA5. 	Comment noted	
	<ul style="list-style-type: none"> The Trust has submitted a planning application in accordance with the adopted and proposed site allocation. The planning application provides a comprehensive scheme for the whole of PS34 and includes a masterplan as well clear parameters for the development satisfying the requirements in PS34 for a masterplan and development brief. 	Comment noted	
Policy wording modifications: None			
SDC Cllr Haydn Jones (500)	<ul style="list-style-type: none"> Sharpness Docks and hinterland need to evolve and respond to developments in international shipping. 	Comment noted	
	<ul style="list-style-type: none"> Flexibility to develop this area, giving careful consideration to the nearby Severn Estuary SSSI/SAC/SPA/Ramsar, can provide an exciting opportunity to build a residential, business and 	Comment noted	



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
	leisure area that will benefit the residents, the Stroud District and surrounding area.	
	<ul style="list-style-type: none"> The site is justified against reasonable alternatives, deliverable over the plan period and consistent with national policy. 	Comment noted
Policy wording modifications: None		
Natural England (864)	<ul style="list-style-type: none"> Support and agree with the HRA report conclusions regarding this allocation. 	Comment noted
	<ul style="list-style-type: none"> The suite of mitigation measures included in the policy requirements will be sufficient to address risks relating to recreation impacts on the Severn Estuary SAC/SPA/Ramsar from PS34 site alone. 	Comment noted
	<ul style="list-style-type: none"> Contributions towards the updated Severn Estuary strategic mitigation scheme will be sufficient to address risks relating to recreation impacts on the Severn Estuary SAC/SPA/Ramsar and ensure adverse effects alone or in-combination with other developments are addressed. 	Comment noted
Policy wording modifications: None		
Object		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> Support the requirement for development to avoid adverse impacts on the Severn Estuary SAC/SPA/Ramsar. 	Comment noted
	<ul style="list-style-type: none"> Evidence must be provided that the provision of a significant new area of Suitable Alternative Natural Greenspace (SANG) has the qualities and features to make it a desirable alternative to sensitive biodiversity sites and land functionally linked to the Severn Estuary SAC/SPA/Ramsar. 	The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.
	<ul style="list-style-type: none"> The allocation includes Sharpness Docks Local Wildlife Site (LWS), which is cited for its nationally scarce plant species and a core part of the Nature Recovery Network. Development should be required 	The Council has a service level agreement with the GCER which highlights the wildlife interests recorded on site. Policy ES6 provides appropriate safeguards to maintain and enhance biodiversity interest on site.



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
	<p>to ensure no direct impacts on the LWS and include mitigation to ensure no indirect impacts.</p> <ul style="list-style-type: none"> GWT suggested that new green space in addition to the LWS will be required to avoid detrimental impacts on an important part of the Nature Recovery Network. 	Comment noted
Policy wording modifications: None		
Hinton Parish Council (258 & 302)	<ul style="list-style-type: none"> Oldminster Road is a built up residential area with single lane traffic and is unsuitable to serve as a main access to development. 	On-site specifics, including site access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.
	<ul style="list-style-type: none"> Traffic congestion on the bypass and at M5 Junction 14 from the increase in traffic. 	Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> Poor public transport. 	Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.
	<ul style="list-style-type: none"> No school places. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> The site is located within the HSE consultation zone associated with the storage of ammonium nitrate at Sharpness Docks. 	The allocation was confirmed in 2015 after an assessment of the risks associated with the HSE consultation zone. No material changes have occurred since then. The Canal & River Trust has been working to ensure that the detailed layout of the proposed development can be accommodated without impacting upon the HSE inner and middle Risk Zones.
Policy wording modifications: None		
Berkeley Vale Climate Action Network (374)	<ul style="list-style-type: none"> The land allocated for up to 300 new dwellings, a hotel and holiday lodges is too close to the SPA/SAC/Ramsar site. 	The development must be laid out and designed in order to avoid adverse effects on the Severn Estuary SAC/SPA/Ramsar site. New residential units will be located such that the Gloucester & Sharpness Ship Canal separates them from the SAC/SPA/Ramsar site thus avoiding urban pressures such as fly tipping and cat predation. B Class employment will be located wholly to the south of the Estate to maximise its separation from the SAC/SPA/Ramsar site given the potential of this type of development to result in noise and other disturbance. The 'island site' at the north-west of the estate on which
	<ul style="list-style-type: none"> The ground alongside the canal to the north is higher than most of the land in Sharpness Docks which will expose the protected area to more light and sound pollution. 	



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
		<p>up to 50 dwellings, fixed camping and the hotel and holiday lodges will be situated must be delivered in such a way as to ensure that the hotel is adequately screened from the SPA/Ramsar site and that no direct access is possible onto the foreshore from the island.</p> <p>Planning applications for Sharpness Docks must ensure no adverse effect will occur on the integrity of the Severn Estuary SAC/SPA/Ramsar site, otherwise planning permission will not be granted.</p>
	<ul style="list-style-type: none"> There appears to be no SANG or provision for mitigation. 	The Council has an adopted 2017 mitigation strategy for the Seven estuary which is being implemented. This mitigation strategy will be updated by 2023 to take account of changing visitor pressure.
Policy wording modifications: None		
Woodland Trust (404)	<ul style="list-style-type: none"> Planning permission should not be granted where the proposal adversely affects ancient, veteran, and notable trees which are defined in Natural England’s inventory of ancient woodlands. 	Criterion 5 requires Landscaping incorporating existing hedgerows and trees.
	<ul style="list-style-type: none"> The following veteran trees are within the site allocation which should be afforded appropriate protection: Veteran Oak (ATI no: 113473) Veteran Oak (ATI no: 113471) Veteran Oak (ATI no: 113469) Notable Horse Chestnut (ATI no: 113704) 	Comment noted
	<ul style="list-style-type: none"> There should be a presumption in favour of the retention and enhancements of existing tree, woodland, and hedgerow cover. 	Criterion 5 requires Landscaping incorporating existing hedgerows and trees
	<ul style="list-style-type: none"> Where there is an unavoidable loss of trees on site, replacement trees should be planted at a rate of two new trees for each tree lost. 	The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.
	<ul style="list-style-type: none"> Appropriate management measures should be required to be implemented to protect newly planted and existing trees, woodlands and / or hedgerows. 	
	Policy wording modifications: None	



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
Berkeley Town Council (477)	<ul style="list-style-type: none"> Adopted Local Plan allocation with unresolvable access issues that has proved undeliverable. 	Indicative access is set out on Page 173. On-site specifics, including site access and highway safety, to be agreed at the master planning and planning application stage with Gloucestershire Highways.
	<ul style="list-style-type: none"> Oldminster Road unviable as main access due to on-street parking. 	
	<ul style="list-style-type: none"> Danger to highway safety resulting from traffic congestion entering Newtown from the bypass, under the railway arch. 	
	<ul style="list-style-type: none"> The cost of repairing the High Bridge is unviable. 	The Canal & River Trust continue to propose the repair of the High Bridge as part of their plans for the area.
	<ul style="list-style-type: none"> High cost of soil decontamination works associated with the marina enlargement will reduce or cut locally needed affordable housing provision. 	The Council's Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> Impact on the conservation area. Impact on adjacent Severn Estuary SAC, SPA and Ramsar site and associated wildlife from light pollution and recreational disturbance. 	<p>The development must be laid out and designed in order to avoid adverse effects on the Severn Estuary SAC/SPA/Ramsar site. New residential units will be located such that the Gloucester & Sharpness Ship Canal separates them from the SAC/SPA/Ramsar site thus avoiding urban pressures such as fly tipping and cat predation. B Class employment will be located wholly to the south of the Estate to maximise its separation from the SAC/SPA/Ramsar site given the potential of this type of development to result in noise and other disturbance. The 'island site' at the north-west of the estate on which up to 50 dwellings, fixed camping and the hotel and holiday lodges will be situated must be delivered in such a way as to ensure that the hotel is adequately screened from the SPA/Ramsar site and that no direct access is possible onto the foreshore from the island.</p> <p>Planning applications for Sharpness Docks must ensure no adverse effect will occur on the integrity of the Severn Estuary SAC/SPA/Ramsar site, otherwise planning permission will not be granted.</p>
Policy wording modifications: None		
SDC Cllr Gordon	<ul style="list-style-type: none"> Ammonium Nitrate Storage site at Sharpness licenced 	The allocation was confirmed in 2015 after an assessment of the risks



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
Craig (665)	to store 15,000 tones. In practice only 5,000 tonnes of the licence is utilised which enables the site to be rated as a lower tier site with different storage constraints.	associated with the HSE consultation zone. No material changes have occurred since then. The Canal & River Trust has been working to ensure that the detailed layout of the proposed development can be accommodated without impacting upon the HSE inner and middle Risk Zones.
	<ul style="list-style-type: none"> The site is located within the Health and Safety Executive (HSE) consultation distance associated with a potential explosion at the storage facility. 	
	<ul style="list-style-type: none"> It is normal for the HSE to object to any major development within the consultation distance. 	
	<ul style="list-style-type: none"> The HSE consider the storage site at Sharpness to be well managed and they have no issues regarding the storage process. 	Comment noted
	<ul style="list-style-type: none"> Results awaited from the recent Beirut disaster inquiry and implications for HSE consultation distances. 	The Plan needs to be based on existing policy. This is conjecture and is not supported by any statement or interim position from the HSE.
	<ul style="list-style-type: none"> Likely increase in consultation distance at Sharpness should preclude development of this already partially constrained site. 	The Plan needs to be based on existing policy. This is conjecture and is not supported by any statement or interim position from the HSE.
	<ul style="list-style-type: none"> Alternative sites available at Moreton Valance and Whitminster not impacted by uncertainty. 	These sites will not support the regeneration of Berkeley/Sharpness.
Policy wording modifications: None		
Walking Berkeley Vale's Endangered Byways (731)	<ul style="list-style-type: none"> Impacts on wildlife destruction and proximity to the Severn Estuary not given enough consideration. 	The development must be laid out and designed in order to avoid adverse effects on the Severn Estuary SAC/SPA/Ramsar site. New residential units will be located such that the Gloucester & Sharpness Ship Canal separates them from the SAC/SPA/Ramsar site thus avoiding urban pressures such as fly tipping and cat predation. B Class employment will be located wholly to the south of the Estate to maximise its separation from the SAC/SPA/Ramsar site given the potential of this type of development to result in noise and other disturbance. The 'island site' at the north-west of the estate on which up to 50 dwellings, fixed camping and the hotel and holiday lodges will be situated must be delivered in such a way as to ensure that the hotel is adequately screened from the SPA/Ramsar site and that no direct access is



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
		<p>possible onto the foreshore from the island.</p> <p>Planning applications for Sharpness Docks must ensure no adverse effect will occur on the integrity of the Severn Estuary SAC/SPA/Ramsar site, otherwise planning permission will not be granted.</p>
Policy wording modifications: None		
Gloucestershire Ramblers, South Cotswold Group (793)	<ul style="list-style-type: none"> A dialogue would be welcome to discuss proposed diversions, extinguishments and changes of use to rights of way. 	On-site specifics, including pedestrian, cycle and vehicular site access, highway safety and the incorporation of the existing PROW, to be addressed at the masterplan / planning application stage, in agreement with Gloucestershire Highways. Delivery Policy E112 requires development proposals that are likely to have a significant impact on the local transport network to submit a Transport Assessment, as well as a Travel Plan.
	<ul style="list-style-type: none"> Impact on the experience of walking the Severn Way long distance trail has not been specifically considered. 	
	<ul style="list-style-type: none"> Proposals should comply with Defra Rights of Way Circular 1/09 Guidance for Local Authorities. 	
	<ul style="list-style-type: none"> Proposed cycle and pedestrian routes through the development connecting with Oldminster Road and the Severn Way, including the restoration of the former railway bridge link and improvements to the high level swing bridge, should observe the Government's Gear Change document for walking and cycling routes. 	Comment noted
Policy wording modifications: None		
Gloucestershire County Council (904)	<ul style="list-style-type: none"> The policy and supporting text fails to acknowledge the need to safeguard mineral and waste management infrastructure that is present at Sharpness Docks and identified on the county's Minerals and Waste Policies Map. 	The Council has prepared a Statement of Common Ground with Gloucestershire County Council, which has acknowledged this objection and where "both parties are committed to working together to resolve this soundness matter and will continue dialogue accordingly." (Duty to Cooperate Statement (EB3))
	<ul style="list-style-type: none"> The 'Planning constraints and designations' set out on page 169 should include the presence of minerals and waste infrastructure and the need to ensure their efficient and effective operations will not be compromised by new development. 	Further discussion with GCC required. All suggested policy wording modifications will be considered by the Inspectors at the EIP.



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks			
	<ul style="list-style-type: none"> The main policy text, part a, should include a requirement that will ensure future dock uses and dock-related industrial and distribution uses will not prejudice the efficient and effective operations of safeguarded minerals and waste infrastructure. 	Further discussion with GCC required. All suggested policy wording modifications will be considered by the Inspectors at the EIP.	
Lichfields for Charfield Landowners Consortium (923)	<ul style="list-style-type: none"> It is essential that a full assessment of the allocation and its impact on Junction 14 is carried out. 	Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.	
	<ul style="list-style-type: none"> The impact of strategic growth on M5 J14 must be tested taking into account cumulative growth in neighbouring local authority areas (e.g. Charfield) with appropriate contributions secured for a strategic highways solution and included as an integral requirement of the draft policy. 		
	<ul style="list-style-type: none"> The policy is not supported by sufficient evidence of effective joint working on infrastructure and cross-boundary strategic matters with South Gloucestershire. 	The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan.	
	Policy wording modifications:		
	<ul style="list-style-type: none"> Policy PS34 must reference the significant infrastructure issues at M5 Junction 14 and the mitigation required to ensure growth in Stroud is sustainable and deliverable. This needs to be added as a key bullet within the policy wording to make the point explicit as it is such a significant issue and key to the site's deliverability. 	Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.	
<ul style="list-style-type: none"> The plan should make it clear that no development should come forward until infrastructure has been designed, costed and agreed with Highways England, South Gloucestershire Council and other members of the Junction 14 Working Group and the works implemented. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.		
Comment			
The Wildfowl &	<ul style="list-style-type: none"> Superseded version of the HRA initially published on 	Only this representor and their 'associate' were impacted by this. To date,	



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
Wetlands Trust (WWT) (68)	the consultation landing page.	the Council has still not changed this link, yet all other representors were and still are taken to the correct document.
	<ul style="list-style-type: none"> Impact on interest features of Severn Estuary SPA/SAC/Ramsar site, internationally important for many species and habitats. 	<p>The development must be laid out and designed in order to avoid adverse effects on the Severn Estuary SAC/SPA/Ramsar site. New residential units will be located such that the Gloucester & Sharpness Ship Canal separates them from the SAC/SPA/Ramsar site thus avoiding urban pressures such as fly tipping and cat predation. B Class employment will be located wholly to the south of the Estate to maximise its separation from the SAC/SPA/Ramsar site given the potential of this type of development to result in noise and other disturbance. The 'island site' at the north-west of the estate on which up to 50 dwellings, fixed camping and the hotel and holiday lodges will be situated must be delivered in such a way as to ensure that the hotel is adequately screened from the SPA/Ramsar site and that no direct access is possible onto the foreshore from the island.</p> <p>Planning applications for Sharpness Docks must ensure no adverse effect will occur on the integrity of the Severn Estuary SAC/SPA/Ramsar site, otherwise planning permission will not be granted.</p>
	<ul style="list-style-type: none"> No proposals should be approved until measures to ensure no adverse impact have been identified. 	
	<ul style="list-style-type: none"> Further work is needed to establish the extent and nature of the impacts, their combined effects on the site, what avoidance and mitigation measures may be possible and how they can be justified and supported by evidence. 	
	<ul style="list-style-type: none"> The updated HRA provides scant specific details of the necessary mitigation measures that will be adopted to ensure no adverse impact on the Severn Estuary SPA/SAC/Ramsar site. <ul style="list-style-type: none"> Proposed mitigation measures should be confirmed, e.g. in an updated Severn Estuary Recreation & Mitigation Strategy. 	
Policy wording modifications: None		
Marine Management Organisation (811)	<ul style="list-style-type: none"> Any policies that are promoting development in the marine area or surrounding areas such as Sharpness docks or marinas should refer to the Draft South West Marine Plan under section 58.3 of the Marine and Coastal Access Act (2009) 	It is not advised that Local Plan Policies refer to other documents, as they may be superseded or changed during the life of the plan, leaving the policy out of date or irrelevant.
	Policy wording modifications: None	
CPRE Gloucestershire (847)	<ul style="list-style-type: none"> Protection of the Severn Estuary SAC/SPA/Ramsar site must be totally complied with, agreed with Natural England and compliant with all the regulations of the HRA. 	The development must be laid out and designed in order to avoid adverse effects on the Severn Estuary SAC/SPA/Ramsar site. New residential units will be located such that the Gloucester & Sharpness Ship Canal separates them from the SAC/SPA/Ramsar site thus avoiding urban pressures such as fly tipping and cat predation. B Class employment will be located wholly to the south of the Estate to maximise its separation from the SAC/SPA/Ramsar site given the potential of this type of development to result in noise and



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
		<p>other disturbance. The 'island site' at the north-west of the estate on which up to 50 dwellings, fixed camping and the hotel and holiday lodges will be situated must be delivered in such a way as to ensure that the hotel is adequately screened from the SPA/Ramsar site and that no direct access is possible onto the foreshore from the island.</p> <p>Planning applications for Sharpness Docks must ensure no adverse effect will occur on the integrity of the Severn Estuary SAC/SPA/Ramsar site, otherwise planning permission will not be granted.</p>
	<ul style="list-style-type: none"> The Port of Sharpness has a licence to store up to 15,000 tonnes of Ammonium Nitrate. Proposals should take into account any HSE review of advice following the Beirut disaster inquiry. 	The allocation was confirmed in 2015 after an assessment of the risks associated with the HSE consultation zone. No material changes have occurred since then. There has also been no indication the very different Beirut disaster will change the UK HSE approach to storage. The HSE currently consider the site to be very well run and not pose any risk.
	<ul style="list-style-type: none"> Increased capacity for management of waste water and sewage should be agreed with a start date before the development plans begin. Funding for this is out of the control of SDC. 	All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP (EB69).
	<ul style="list-style-type: none"> Sharpness has had land allocated for employment for over 30 years. Very little of this has been taken up. 	Comment noted
	<ul style="list-style-type: none"> The route of the Severn Way should not be relocated and footpaths through the site should be retained. 	On-site specifics, including incorporating the existing Public Right of Way, to be addressed at the masterplan/ planning application stage in agreement with Gloucestershire Highways.
	Policy wording modifications: None	
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
197, 211, 256, 336, 430, 517, 695, 747	<ul style="list-style-type: none"> Support brownfield redevelopment. 	Comment noted
130, 235, 281, 282, 283, 448, 646	<ul style="list-style-type: none"> Object to greenfield development. 	Sites that are on greenfield land classed as high quality agricultural land (Grades 1, 2 or 3a) are rated red, as having a significant negative (--) effect, for efficiency in land use and protection of soil quality regardless of size.



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
		Sites are allocated having regard to Sustainability Appraisal across 17 SA objectives; this is a balanced judgement taking all objectives into consideration, SA Report Appendix 4 (CD3b).
130, 448	<ul style="list-style-type: none"> There should be more housing in the north of the District to reduce commuting/ access better infrastructure and employment. 	Comment noted
364, 448, 547	<ul style="list-style-type: none"> Contradicts climate emergency agenda for tackling climate change. 	Dealing with climate change is not about banning development. New Core Policy DCP1 Delivering Carbon Neutral by 2030 sets out the overarching requirements for all new development, to support the Council's target to become Carbon Neutral by 2030.
120, 130, 220, 235, 413, 426, 448, 547, 573, 651, 709	<ul style="list-style-type: none"> Will increase commuting for work and leisure with associated air quality impacts. 	<p>Topic Paper – Transport October 2021 ((EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices and addressing air quality.</p> <p>The Sustainability Appraisal includes assessment of all sites and reasonable alternatives against SA 10: To ensure that air quality continues to improve based on sustainable access to employment and key services and facilities, SA Report Appendix 3 - 9 (CD3b).</p>
Strategic growth and development locations		
131, 209	<ul style="list-style-type: none"> Support a reasonable level of development in scale with local infrastructure. 	Comment noted
128, 130, 140, 151, 164, 220, 235, 270, 281, 282, 283, 306, 307, 329, 349, 413, 433, 435, 448, 528, 547, 629, 646, 704, 720	<ul style="list-style-type: none"> Scale of development disproportionate to local area and amenities. 	The Council considers the proposed allocation to be of appropriate scale and size for this Tier 3a settlement. Justification for the role of Newtown & Sharpness in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).
158, 220, 262, 412, 415	<ul style="list-style-type: none"> Combined scale and cumulative impacts of strategic allocations in the Berkeley cluster are too great. 	The Council considers the proposed allocation to be of appropriate scale and size for this Tier 3a settlement. Justification for the role of Newtown & Sharpness in the development strategy and the allocation of sites is set out



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
		in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).
130	<ul style="list-style-type: none"> Scale of development in the south of the District disproportionate. 	The Council considers the proposed allocation to be of appropriate scale and size for this Tier 3a settlement. Justification for the role of Newtown & Sharpness in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).
192, 220, 349, 413,	<ul style="list-style-type: none"> Exceeds local need/ demand for housing and won't deliver promised amount of 'affordable homes'. 	Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings OR of providing 4 or more dwellings in designated rural areas. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
101, 149, 225, 232, 430, 241, 243, 248, 287, 303, 334, 375, 468, 523, 536, 567, 573, 701, 730, 791, 894	<ul style="list-style-type: none"> Inappropriate location for development due to Health and safety hazard from ammonium nitrate storage at Sharpness Docks. 	The allocation was confirmed in 2015 after an assessment of the risks associated with the HSE consultation zone. No material changes have occurred since then. The Canal & River Trust has been working to ensure that the detailed layout of the proposed development can be accommodated without impacting upon the HSE inner and middle Risk Zones.
160, 774	<ul style="list-style-type: none"> Not supported by the local community. 	The allocation has received public support. For example, at the Emerging Strategy stage (CD4b) 72 people or organisations supported it, with 31 against.
523, 567	<ul style="list-style-type: none"> Late publication of key HRA and SFRA evidence base documents after inclusion of site within the Plan. 	<p>The Statement of Community Involvement March 2020 (EB2) sets out how Stroud District Council has informed, engaged and consulted people throughout the plan preparation process.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including the results of public consultation.</p>
Settlement hierarchy and place making		
517	<ul style="list-style-type: none"> Development should respect and improve the 	The development must be laid out and designed in order to avoid adverse



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
	amenity value of the river, canal, coastguard station and Vindicatrix camp areas to benefit the environment and wellbeing of future residents.	effects on the Severn Estuary SAC/SPA/Ramsar site. New residential units will be located such that the Gloucester & Sharpness Ship Canal separates them from the SAC/SPA/Ramsar site thus avoiding urban pressures such as fly tipping and cat predation. B Class employment will be located wholly to the south of the Estate to maximise its separation from the SAC/SPA/Ramsar site given the potential of this type of development to result in noise and other disturbance. The 'island site' at the north-west of the estate on which up to 50 dwellings, fixed camping and the hotel and holiday lodges will be situated must be delivered in such a way as to ensure that the hotel is adequately screened from the SPA/Ramsar site and that no direct access is possible onto the foreshore from the island. Planning applications for Sharpness Docks must ensure no adverse effect will occur on the integrity of the Severn Estuary SAC/SPA/Ramsar site, otherwise planning permission will not be granted.
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
131	<ul style="list-style-type: none"> Local need for new housing within the Berkeley area. 	Comment noted
336, 695	<ul style="list-style-type: none"> Opportunity for good quality housing investment. 	Comment noted
123, 130	<ul style="list-style-type: none"> Question provision and affordability of housing for local young people. 	Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 10 or more dwellings or of providing 4 or more dwellings in designated rural areas, including e.g Kingswood. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
9, 118, 149, 160, 225, 226, 243, 248, 267, 279, 292, 303,	<ul style="list-style-type: none"> Working port (noise/ traffic/ dust/ smells) not compatible with residential and leisure developments within prevailing wind direction. 	A vision for the Sharpness Docks Estate has been prepared by the owners, the Canal and River Trust, a charitable trust. Whilst land to the south of the Docks is envisaged to remain a consolidated dock operation



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
326, 347, 348, 373, 378, 380, 421, 435, 523, 536, 556, 567, 580, 701, 743, 762		with opportunities to expand onto adjoining allocated land, the vision for the north of the Docks envisages a tourism-led mixed use development, benefiting existing communities and taking advantage of the marina, canal, heritage, natural environment and undeveloped land. The allocation of land for mixed uses in this area is specifically to achieve these objectives. The site comprises a number of parcels reflecting existing resources and historic activities, including the marina and land for new housing, a new camp and area for tourism development and amenity grounds. Comprehensive master planning will ensure all of the uses are designed and located to complement each other with little impact from noise/ traffic/ dust/ smells.
Community facilities		
336, 355	<ul style="list-style-type: none"> Should include other facilities alongside housing to deliver community benefit and avoid pressure on existing local services. 	The relative accessibility of the site and wider settlement access to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).
145, 235, 306, 307, 515, 544, 800	<ul style="list-style-type: none"> Local primary and secondary schools at or close to capacity. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
220, 380	<ul style="list-style-type: none"> Remote from local secondary schools. 	
240, 329, 349, 372, 774	<ul style="list-style-type: none"> Impact on community identity 	Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms
265, 354	<ul style="list-style-type: none"> Development of working dock for housing and potential hotel/ camping site will not benefit local community. 	These facilities will bring employment and improved service opportunities to the local community.
701	<ul style="list-style-type: none"> Unsuitable for tourism and leisure uses due to strong river currents and lack of bridleways. 	Master planning will be required in order to provide a mix of tourism, leisure and recreational uses, supported by new housing development, including: <ol style="list-style-type: none"> Up to 300 dwellings, including 90 affordable dwellings, unless viability testing indicates otherwise Hotel, holiday lodges and fixed camping uses An expanded marina basin including ancillary retail and food and drink uses



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
		4. Tourism and recreational related facilities, including a community football pitch, community gardens, informal green space and equestrian uses.
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
139, 276, 336, 695	<ul style="list-style-type: none"> Support investment in Sharpness Docks and opportunity for local jobs, tourism and leisure. 	Comment noted
513, 519, 628	<ul style="list-style-type: none"> Potential tourism benefits to the local area. 	Comment noted
164	<ul style="list-style-type: none"> Will damage tourism in the local area. 	Comment noted
119, 120, 196, 233, 326, 334, 371, 375, 382, 468, 613, 653, 730	<ul style="list-style-type: none"> Impact on working commercial docks and employment. 	The development proposals will have a positive impact on the docks by including: <ol style="list-style-type: none"> Expansion land (7 hectares) for new development Vehicular access via the internal dock roads below / including the low level bridge
123, 281, 282, 283, 306, 307, 363, 368, 413, 426, 448, 515, 547, 646, 651	<ul style="list-style-type: none"> Insufficient local jobs and remote from employment centres. 	The new development will bring a range of new job opportunities and the relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).
Retail and town centres		
261, 336	<ul style="list-style-type: none"> Support local shops and facilities around the docks. 	Comment noted
Travel, transport and highways		
197, 695	<ul style="list-style-type: none"> Benefits from existing road and rail infrastructure. 	Comment noted
9, 118, 180, 216, 232, 243, 279, 289, 292, 303, 326, 334, 348, 355, 370, 375, 435, 494, 512, 523, 536, 561, 567, 573, 580, 617, 701, 743, 756, 767, 784	<ul style="list-style-type: none"> Oldminster Road/ High Bridge unsuitable as main access due to width of road, traffic congestion, on-street parking and flooding. 	The intention is to achieve segregated access infrastructure, with access to Sharpness Docks South via the internal dock roads below and including the low level bridge only. Sharpness Docks North will be accessed via Oldminster Road with links under the former railway bridge into the north east and via the high level bridge to the north west. A new footway and pedestrian improvements will be provided along Oldminster Road, linking the development back to Newtown, and contributions will also be provided towards improving the frequency and quality of local bus services to connect the development and Newtown with Berkeley and Dursley.
103, 123, 430, 348, 350, 363, 368, 528,	<ul style="list-style-type: none"> End of line location with inadequate road access. 	



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
651, 802		
118	<ul style="list-style-type: none"> Access should be from the main road with separate access for industrial traffic. 	
83, 126, 129, 130, 140, 145, 149, 151, 205, 220, 263, 266, 281, 282, 283, 285, 325, 380, 413, 426, 448, 472, 515, 528, 547, 556, 652, 700, 734, 746, 767, 778, 800,	<ul style="list-style-type: none"> Wider local and strategic road network (Alkington Lane, B4066, M5 Junctions 13 & 14) inadequate to cope with additional traffic. 	Ahead of the EIP, the Council is updating its Highways evidence base and documentation. This will be published in due course.
123, 130, 149, 235, 349, 426, 448, 547, 556, 646	<ul style="list-style-type: none"> Poor public transport links. 	Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities
123, 130, 140, 220, 263, 325, 448, 701, 791, 800, 802	<ul style="list-style-type: none"> Inadequate rail infrastructure and significant doubts over proposed rail link-up. 	
130, 145, 146, 151, 248, 303, 329, 348, 448, 536, 791	<ul style="list-style-type: none"> Increased traffic on using rural lanes, including National Cycling Route 41, used by cyclists, pedestrians and horse riders. 	<p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>On-site specifics, including pedestrian, cycle and vehicular site access, highway safety and the incorporation of the existing PROW, to be addressed at the masterplan / planning application stage, in agreement with Gloucestershire Highways. Delivery Policy EI12 requires development proposals that are likely to have a significant impact on the local transport network to submit a Transport Assessment, as well as a Travel Plan.</p>
558	<ul style="list-style-type: none"> Contrary to Sharpness-Natural-Neighbourhoods (November 2019) proposals to discourage use of rural lanes. 	Comment noted
213, 287, 381, 523, 567, 681, 894	<ul style="list-style-type: none"> Impact on the Severn Way and loss of shoreline access. 	The priority in this location is to provide mitigation measures to protect the purposes for designating the Severn Estuary - a SPA, SAC and RAMSAR site.



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
		Recreation impacts from visitors will require diversions of routes but the overall result will be measures which enhance local amenity as well as local biodiversity.
423, 558	<ul style="list-style-type: none"> Impact on the Vale of Berkeley Heritage Railway and extension plans. 	The re-use of Sharpness Docks north for leisure and tourism purposes will be complementary to the aims of the Berkeley Vale Heritage Trust and Policy PS34 states that the disused rail line will be protected.
107	<ul style="list-style-type: none"> Impact on SARA lifeboat operations. 	There are no reported concerns that SARA lifeboat operation will be negatively impacted.
Infrastructure		
120, 121, 123, 129, 130, 140, 164, 196, 218, 234, 235, 249, 255, 266, 287, 306, 307, 329, 348, 349, 354, 356, 364, 387, 426, 448, 472, 515, 530, 544, 547, 615, 617, 646, 680, 734, 791, 795	<ul style="list-style-type: none"> Inadequate local infrastructure and services. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
700, 767, 784	<ul style="list-style-type: none"> Unviable due to infrastructure costs. 	The Council's Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
326, 448	<ul style="list-style-type: none"> Environmental concern over increase of untreated sewage discharge into the Severn from no mains sewage system on the 'island'. 	All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP (EB69).
556, 767, 784	<ul style="list-style-type: none"> Contaminated land, prohibitive clean-up costs and impact on affordable housing provision. 	The Council's Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
		published in due course.
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
130, 146, 164, 248, 288, 349, 361, 382, 413, 448, 523, 567, 646, 700, 791, 894	<ul style="list-style-type: none"> Flood risk and management. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
140, 151, 180, 364, 547, 711, 802	<ul style="list-style-type: none"> Increased surface water flood risk from development within the flood plain. 	<p>All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.</p> <p>The Level 2 SFRA Addendum for Sharpness and the Council's Sequential Test document both contain important flood risk advice for developing the site. Key aspects will be ensuring that development has safe access and egress in times of flood, locating development outside the floodplain and incorporating space for flood water to reduce flood risk.</p>
276, 894	<ul style="list-style-type: none"> Impacts on Severn Estuary SAC/SPA/Ramsar will need careful management and compliance to ensure protection. 	The development must be laid out and designed in order to avoid adverse effects on the Severn Estuary SAC/SPA/Ramsar site. New residential units will be located such that the Gloucester & Sharpness Ship Canal separates them from the SAC/SPA/Ramsar site thus avoiding urban pressures such as fly tipping and cat predation. B Class employment will be located wholly to the south of the Estate to maximise its separation from the SAC/SPA/Ramsar site given the potential of this type of development to result in noise and other disturbance. The 'island site' at the north-west of the estate on which up to 50 dwellings, fixed camping and the hotel and holiday lodges will be situated must be delivered in such a way as to ensure that the hotel is adequately screened from the SPA/Ramsar site and that no direct access is possible onto the foreshore from the island.
130, 287, 349, 361, 381, 425, 448, 523, 547, 567, 759, 764, 787, 802	<ul style="list-style-type: none"> Detrimental impact on Severn Estuary SAC/SPA/Ramsar, SSSI and associated biodiversity including marine life. 	<p>Planning applications for Sharpness Docks must ensure no adverse effect will occur on the integrity of the Severn Estuary SAC/SPA/Ramsar site, otherwise planning permission will not be granted.</p>



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
573, 681, 745, 764	<ul style="list-style-type: none"> Requires further assessment of impacts on protected habitats, associated species of national and international importance and potential for mitigation. 	The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.
80, 423, 709	<ul style="list-style-type: none"> Area should be protected for local wildlife and green spaces. 	
107, 118, 149, 151, 159, 193, 196, 207, 233, 281, 282, 283, 292, 364, 370, 378, 380, 382, 413, 473, 580, 615, 701, 734, 743, 756, 784, 791	<ul style="list-style-type: none"> Loss of habitat and impacts on wildlife and birdlife including from increased disturbance, noise and light pollution. 	Careful lighting design, both with regard to security lighting during construction and permanent lighting during occupation, to ensure no increase in illumination of the SAC/SPA/Ramsar site. Lighting levels in the site should not exceed levels above the ILP classification E1 (Natural Lighting Zone that is intrinsically dark) for the Severn Estuary and its foreshore; - Details of potential mitigation measures, such as identifying and securing bird refuge areas within or close to the development area, and of potential on-site management (to mitigate both recreational pressure during the non-breeding period and incidences of fly tipping) that would be undertaken to ensure no adverse effect.
681	<ul style="list-style-type: none"> Site includes two areas of Priority Habitat which should be protected from development. 	The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.
123, 129, 140, 193, 196, 218, 238, 249, 262, 289, 325, 329, 375, 515, 704,	<ul style="list-style-type: none"> Negative impacts on rural character and environment. 	Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.
107, 303, 348, 523, 567	<ul style="list-style-type: none"> Loss of woodland habitat at Vindicatrix Camp on the banks of the Severn. 	Criterion 5 of the policy requires: Landscaping incorporating existing hedgerows and trees
381, 523, 567	<ul style="list-style-type: none"> Proposed mitigation measures inadequate for cumulative impacts of PS34 and PS36 and associated recreational pressure. 	Planning applications for Sharpness Docks must ensure no adverse effect will occur on the integrity of the Severn Estuary SAC/SPA/Ramsar site, otherwise planning permission will not be granted.



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
523, 567	<ul style="list-style-type: none"> Impact on Sharpness Docks Local Wildlife Site and wider Nature Recovery Network. 	<p>The development must be laid out and designed in order to avoid adverse effects on the Severn Estuary SAC/SPA/Ramsar site. New residential units will be located such that the Gloucester & Sharpness Ship Canal separates them from the SAC/SPA/Ramsar site thus avoiding urban pressures such as fly tipping and cat predation. B Class employment will be located wholly to the south of the Estate to maximise its separation from the SAC/SPA/Ramsar site given the potential of this type of development to result in noise and other disturbance. The 'island site' at the north-west of the estate on which up to 50 dwellings, fixed camping and the hotel and holiday lodges will be situated must be delivered in such a way as to ensure that the hotel is adequately screened from the SPA/Ramsar site and that no direct access is possible onto the foreshore from the island.</p> <p>Planning applications for Sharpness Docks must ensure no adverse effect will occur on the integrity of the Severn Estuary SAC/SPA/Ramsar site, otherwise planning permission will not be granted.</p>
523, 567	<ul style="list-style-type: none"> Japanese Knotweed is present at the base of the High Level Bridge, between the bridge and the canal and close to the lifeboat station which may affect deliverability. 	Comment noted
523, 567	<ul style="list-style-type: none"> Impact on Sharpness picnic site 	<p>A vision for the Sharpness Docks Estate has been prepared by the owners, the Canal and River Trust, a charitable trust. Whilst land to the south of the Docks is envisaged to remain a consolidated dock operation with opportunities to expand onto adjoining allocated land, the vision for the north of the Docks envisages a tourism-led mixed use development, benefiting existing communities and taking advantage of the marina, canal, heritage, natural environment and undeveloped land. The allocation of land for mixed uses in this area is specifically to achieve these objectives. The site comprises a number of parcels reflecting existing resources and historic activities, including the marina and land for new housing, a new camp and area for tourism development and amenity grounds.</p>
Landscape		
130, 207, 448, 523,	<ul style="list-style-type: none"> Significant urbanisation impact on the unique 	On-site specifics; including strategic landscaping to provide accessible open



Site Reference: Strategic Site Allocation Policy PS34 Sharpness Docks		
567, 646, 700, 756	estuarine landscape.	space, minimise landscape impacts and safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.
Historic environment		
197, 523, 567	<ul style="list-style-type: none"> Increased pressure on Purton Hulks to the north. 	Purton Hulks, is a fascinating ships 'graveyard' on the estuary foreshore. It is not envisaged any harm will take place as a result of development.
151	<ul style="list-style-type: none"> Impact on historic Berkeley 	Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.
523, 567	<ul style="list-style-type: none"> Impact on heritage interest and memorial at the Vindicatrix Camp area. 	It is not envisaged any harm will take place as a result of development.
556, 573, 613, 756, 784	<ul style="list-style-type: none"> Impact on Sharpness Old Dock Conservation Area 	The Conservation Area covers the Sharpness Old Dock and Sharpness canal to the north. These areas will not be harmed by development.
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		



PS35

Site Reference: Local Sites Allocation Policy PS35 Land at Focus School, Wanswell			
Number of representations: 264		Support: 28	Object: 233
Stakeholders		Comments	Stroud District Council Response
Support			
Sport England (133)	• Supports the retention of the school playing fields.	Comment noted	
	• Highlight potential impact from ball strike on new residential development.	Comment noted	
	• Highlight potential conflict between developing the sports use potential of the playing fields and residential amenity.	Comment noted	
	Policy wording modifications: None		
SDC Cllr Haydn Jones (500)	• Support development limited strictly to the built form and footprint of the existing buildings and immediate developed land as described in Para 3.5.15.	Comment noted	
	Policy wording modifications: None		
Savills (UK) Limited for The Berkeley Estate (TBE) (878)	• Support allocation of TBE land north and east of PS35 for development, identified as part of PS36 Phase 2.	Comment noted	
	• Land better functionally linked to PS35: <ul style="list-style-type: none"> ○ Visually and physically contained land parcel. ○ Separated from PS36 by Halmore Lane ○ Logical rounding off of the existing settlement at Station Road/ Halmore Lane ○ Unconstrained land parcel 	Comment noted	
	• PS35 and TBE land should be masterplanned together as Land south of Halmore Lane and at Focus School, Wanswell (Appendix 1).	Comment noted	
	• PS35 development of 70 dwellings on footprint of existing school buildings considered high density development.	The density is considered appropriate for the size, scale and location of development.	
	• Combined site Land south of Halmore Lane and at Focus School would allow delivery of critical infrastructure including foul and surface water drainage and opportunities to deliver biodiversity net	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.	



Site Reference: Local Sites Allocation Policy PS35 Land at Focus School, Wanswell		
	gain.	
	<ul style="list-style-type: none"> PS35 and TBE land identified as Phase 1 of potential wider extension of Wanswell village, including Phases 2 and 3 west of Station Road, currently being explored (see Appendix 2) as an alternative to PS36. 	Comment noted
	Policy wording modifications:	
	<ul style="list-style-type: none"> Extend allocation PS35 to include TBE land north and east of Land at Focus School as shown in Figure 1 and Appendix 1 Land south of Halmore Lane and at Focus School. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
	<ul style="list-style-type: none"> Typographical error p174: Local Sites Allocation Policy PS35 is titled Land at Lynch Road, Berkeley and should be amended to Land at Focus School, Wanswell. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Pegasus Group for Whitecroft Education Trust (939) Site promoter	<ul style="list-style-type: none"> Support allocation of site for development. 	Comment noted
	<ul style="list-style-type: none"> Site is suitable for a higher quantum of development circa 140 dwellings: <ul style="list-style-type: none"> 70 dwellings will not make school relocation viable. Would deliver more affordable housing on the site. 	The Council's Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> Additional potential opportunity for development of wider land parcel, including land north and east of PS35 promoted by the Berkeley Estate. 	Comment noted
	<ul style="list-style-type: none"> Lack of evidence for the retention and enhancement of existing playing pitches and open space: <ul style="list-style-type: none"> Current use in association with the School or at the School's discretion. Facilities are not generally accessible to the public, in use by local sports teams or providing a wider community service. Not identified in Stroud Open Space and GI Study as making a significant contribution to the 	The retention and enhancement of the existing playing pitches and open space is required to meet the specific recreation needs of the wider new community and strategy for provision at a Sharpness new settlement.



Site Reference: Local Sites Allocation Policy PS35 Land at Focus School, Wanswell		
	<ul style="list-style-type: none"> open space and GI assets in the Berkeley Cluster. ○ Not listed as a Key Site in the Playing Pitch Strategy (PPS) Action Plan for the Berkeley Cluster. 	
	<ul style="list-style-type: none"> ● Retention of playing pitches/ recreation space to support social and community infrastructure for the Sharpness New Settlement (SNS) is problematic: <ul style="list-style-type: none"> ○ Premature identification as playing pitches/ open space prior to masterplanning of PS36. ○ Other potentially preferable locations for playing pitches/ sporting facilities as part of the SNS. ○ Community and social infrastructure needs for the SNS should be met within the dominant landholding(s) with financial contributions from smaller sites. 	Comment noted
Policy wording modifications:		
	<ul style="list-style-type: none"> ● Land at the Focus School should be allocated for development of a minimum of 140 dwellings, public open space and associated works. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Object		
Hinton Parish Council (258 & 302)	<ul style="list-style-type: none"> ● Loss of school ● Clause requiring the retention of the site as a school and preventing the redevelopment of the site. 	The current education providers on site have stated their intentions to vacate the site. The buildings are in need of substantial repair or redevelopment. Redevelopment for housing would provide the opportunity to retain and enhance existing playing fields and open space as part of the overall strategy for future community provision at a Sharpness new settlement. Redevelopment for housing offers the potential to improve parking provision in the local area.
Policy wording modifications: None		
Berkeley Town Council (477)	<ul style="list-style-type: none"> ● Ideal site and location for a new school to support an increased population. 	The current education providers on site have stated their intentions to vacate the site. The buildings are in need of substantial repair or redevelopment. Redevelopment for housing would provide the opportunity to retain and enhance existing playing fields and open space as part of the



Site Reference: Local Sites Allocation Policy PS35 Land at Focus School, Wanswell		
		overall strategy for future community provision at a Sharpness new settlement. Redevelopment for housing offers the potential to improve parking provision in the local area.
	<ul style="list-style-type: none"> Contrary to NPPF requirements for the efficient use of land. 	The redevelopment of a vacated brownfield site to delivery much needed housing in exactly in line with the NPPF requirements to efficiently use land.
	<ul style="list-style-type: none"> Wanswell has no local services for residents, necessitating use of cars so is contrary to Stroud District Council's Carbon Neutral 2030 (CN30) ambitions. 	<p>The Council considers Site Allocation PS35 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p>
	<ul style="list-style-type: none"> Change of use perverse in relation to IDP evidence of high cost of new educational provision. 	The current education providers on site have stated their intentions to vacate the site. The buildings are in need of substantial repair or redevelopment that is not viable.
Policy wording modifications: None		
Walking Berkeley Vale's Endangered Byways (731)	<ul style="list-style-type: none"> Ready-made site to meet local need for a new secondary school. 	The current education providers on site have stated their intentions to vacate the site. The buildings are in need of substantial repair or redevelopment. Redevelopment for housing would provide the opportunity to retain and enhance existing playing fields and open space as part of the overall strategy for future community provision at a Sharpness new settlement. Redevelopment for housing offers the potential to improve parking provision in the local area.
Policy wording modifications: None		
Gloucestershire Ramblers, South Cotswold Group (793)	<ul style="list-style-type: none"> Impact on public footpath east of the site. <ul style="list-style-type: none"> Currently a green path Potential change from a rural experience to walking adjacent to an urban environment. Potential diversion. 	On-site specifics, including incorporating the existing Public Right of Way, to be addressed at the masterplan/ planning application stage in agreement with Gloucestershire Highways.
Policy wording modifications: None		



Site Reference: Local Sites Allocation Policy PS35 Land at Focus School, Wanswell		
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> GWT has no significant initial concerns regarding the impact on biodiversity and ecological networks. 	Comment noted
	<ul style="list-style-type: none"> A full ecological appraisal should be undertaken, including an EIA for impacts on the SPA, SAC and RAMSAR sites. 	Comment noted
	<ul style="list-style-type: none"> Requires the provision of a significant new area of Suitable Alternative Natural Greenspace (SANG) within the cluster, which ideally would be delivered strategically by combining contributions from allocations. <ul style="list-style-type: none"> Will need to evidence that any SANG has the qualities and features to make it a desirable alternative to sensitive biodiversity sites and land functionally linked to them. 	Comment noted
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
145, 146, 256, 288, 336, 695	<ul style="list-style-type: none"> Support brownfield redevelopment of existing school site/ buildings. 	Comment noted
709, 767, 784	<ul style="list-style-type: none"> Countryside development: <ul style="list-style-type: none"> Increased car journeys Impact on climate change Contrary to carbon neutral 2030 ambitions. 	<p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p> <p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>New Core Policy DCP1 Delivering Carbon Neutral by 2030 sets out the</p>



Site Reference: Local Sites Allocation Policy PS35 Land at Focus School, Wanswell		
		overarching requirements for all new development, to support the Council's target to become Carbon Neutral by 2030.
Strategic growth and development locations		
695	<ul style="list-style-type: none"> • Sustainable development. 	Comment noted
225, 276, 288, 334, 336, 347, 430, 435, 789, 794, 802	<ul style="list-style-type: none"> • Appropriate scale to local area. <ul style="list-style-type: none"> ○ Small/ moderate scale ○ Will benefit existing communities of Wanswell and Brookend. 	Comment noted
103, 123, 128, 129, 130, 140, 151, 152, 158, 164, 175, 220, 234, 235, 255, 270, 281, 282, 283, 325, 329, 349, 354, 356, 361, 369, 381, 387, 406, 413, 426, 433, 446, 448, 451, 473, 515, 528, 547, 620, 628, 629, 646, 704, 709, 720, 734, 753, 774, 795, 800	<ul style="list-style-type: none"> • Scale of development and cumulative impacts from PS36 and other allocations within the Berkeley cluster disproportionate to local area. <ul style="list-style-type: none"> ○ Disproportionate scale to Wanswell. ○ Support the position of BaSRAG 	The Council considers the proposed site to be of appropriate scale and size for this Tier 3a settlement. Justification for the role of Berkeley in the development strategy (including its designation as a Tier 3a settlement) and the allocation of site PS35 to meet identified needs is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).
139	<ul style="list-style-type: none"> • Unnecessary given the scale of development of other proposed sites. 	The Council considers the proposed site to be of appropriate scale and size for this Tier 3a settlement. Justification for the role of Berkeley in the development strategy (including its designation as a Tier 3a settlement) and the allocation of site PS35 to meet identified needs is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).
Settlement hierarchy and place making		
No comments received		
Infrastructure and developer contributions		



Site Reference: Local Sites Allocation Policy PS35 Land at Focus School, Wanswell		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
131, 378, 695	<ul style="list-style-type: none"> Support some housing within the Berkeley and Sharpness area to meet local needs. 	Comment noted
147	<ul style="list-style-type: none"> Rural community will not benefit from additional housing. 	The Council considers the proposed site to be of appropriate scale and size for this Tier 3a settlement. Justification for the role of Berkeley in the development strategy (including its designation as a Tier 3a settlement) and the allocation of site PS35 to meet identified needs is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).
192, 348, 372, 423	<ul style="list-style-type: none"> Too much housing <ul style="list-style-type: none"> Within wider local area On the footprint of the existing built area. 	The Council considers the proposed site to be of appropriate scale and size for this Tier 3a settlement. Justification for the role of Berkeley in the development strategy (including its designation as a Tier 3a settlement) and the allocation of site PS35 to meet identified needs is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4).
192	<ul style="list-style-type: none"> Delivery of affordable housing 	Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 4 or more dwellings in designated rural areas, including Hamfallow CP. Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
Community facilities		
9, 79, 118, 119, 120, 160, 196, 207, 209, 210, 213, 221, 226, 230, 232, 243, 247,	<ul style="list-style-type: none"> Loss of school site: <ul style="list-style-type: none"> School site gifted to people of Berkeley and protected by covenant. Should be retained for educational purposes/ 	The current education providers on site have stated their intentions to vacate the site. The buildings are in need of substantial repair or redevelopment. Redevelopment for housing would provide the opportunity to retain and enhance existing playing fields and open space as part of the



Site Reference: Local Sites Allocation Policy PS35 Land at Focus School, Wanswell		
250, 265, 266, 267, 279, 287, 292, 326, 330, 339, 340, 348, 356, 369, 370, 373, 375, 381, 390, 442, 444, 447, 449, 468, 489, 494, 509, 517, 531, 552, 553, 556, 557, 561, 571, 573, 580, 617, 648, 680, 691, 700, 701, 707, 714, 717, 743, 745, 747, 756, 762, 767, 768, 778, 784	<p>new secondary school/ community sports facility/ community asset</p> <ul style="list-style-type: none"> ○ Local need for secondary school provision. ○ Parish Council issues not addressed ○ Well located for sustainable access for pupils from Berkeley and Sharpness. 	<p>overall strategy for future community provision at a Sharpness new settlement. Redevelopment for housing offers the potential to improve parking provision in the local area.</p>
147, 159, 233, 271, 381	<ul style="list-style-type: none"> ● Inadequate local education provision. 	<p>Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.</p>
147, 159, 233, 271, 381, 489, 515, 531, 556, 573, 767, 784	<ul style="list-style-type: none"> ● Inadequate Local services and facilities including shops, health care provision and facilities for young people. <ul style="list-style-type: none"> ○ Lack of services and facilities in Wanswell ○ More than 1 mile from most convenience services and facilities. ○ Poor accessibility to higher level services and facilities. 	<p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b). Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p>
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
147, 651	<ul style="list-style-type: none"> ● Lack of local employment to support growing population. 	<p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b). Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering</p>



Site Reference: Local Sites Allocation Policy PS35 Land at Focus School, Wanswell		
		sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.
Retail and town centres		
No comments received		
Travel, transport and highways		
146	<ul style="list-style-type: none"> Multi user tracks need to include provision for equestrian community. 	On-site specifics, including incorporating the existing Public Right of Way, road design, cycle paths and equestrian provision to be addressed at the masterplan/ planning application stage in agreement with Gloucestershire Highways.
5, 83, 114, 126, 147, 159, 233, 285, 369, 371, 378, 381, 455, 472, 515, 531, 651, 652, 746	<ul style="list-style-type: none"> Inadequate local road infrastructure to cope with additional traffic: <ul style="list-style-type: none"> Alkington Lane, B4066, Breadstone Road Station Road Railway bridge leading into Abwell and Wanswell only 13 feet high. Impact on highway safety of pedestrians, cyclists, horse riders and other road users. Impact on National cycle route 41. 	Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.
489, 571, 680, 767	<ul style="list-style-type: none"> Lack of public transport. 	Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities
Infrastructure		
70, 80, 121, 263, 347, 472	<ul style="list-style-type: none"> Infrastructure inadequate to cope with additional development. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
223,	<ul style="list-style-type: none"> Requires clear plans for transport and community infrastructure. 	Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and

Site Reference: Local Sites Allocation Policy PS35 Land at Focus School, Wanswell		
		improvement of public transport opportunities Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
159, 233	<ul style="list-style-type: none"> Inadequate sewerage infrastructure: <ul style="list-style-type: none"> No mains sewerage in Abwell. 	All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP (EB69).
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
5, 114, 159, 233, 238, 240, 369, 876	<ul style="list-style-type: none"> Impact on residential amenities of existing residents: <ul style="list-style-type: none"> Quality of life Sense of community Noise and light pollution Dog fouling 	Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.
80, 139	<ul style="list-style-type: none"> Site should be protected for local wildlife/ green spaces. 	Development should be restricted to the footprint of the school buildings and associated brownfield land with a strong frontage onto Station Road, with existing landscaping and planting enhanced for local biodiversity.
114, 515, 711, 721	<ul style="list-style-type: none"> Flood risk concerns: <ul style="list-style-type: none"> Close to flood dykes and water meadows. Potential increased flood risk for existing residents from increased run-off from new development. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
114, 193, 238, 707, 876	<ul style="list-style-type: none"> Impact on local wildlife, 	Development should be restricted to the footprint of the school buildings and associated brownfield land with a strong frontage onto Station Road, with existing landscaping and planting enhanced for local biodiversity.
Landscape		
193	<ul style="list-style-type: none"> Visual impact 	On-site specifics; including strategic landscaping to provide accessible open space, minimise landscape impacts and safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.
Historic environment		
126	<ul style="list-style-type: none"> Impact on Wanswell Court, 	Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual



Site Reference: Local Sites Allocation Policy PS35 Land at Focus School, Wanswell		
		and appropriate in townscape, local environment, character and amenity terms.
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		



PS36

Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement			
Number of representations: 476	Support: 12	Object: 448	Comment: 16
Stakeholders	Comments	Stroud District Council Response	
Support			
Sport England (133)	<ul style="list-style-type: none"> The housing layout should be designed in accordance with active design principles. 	The site will be required to deliver a layout which prioritises walking and cycling and access to public transport over the use of the private car and a network of multifunctional Green Infrastructure throughout the development.	
	<ul style="list-style-type: none"> Welcome policy criteria 7 requirement for on-site community and sports built provision and contributions to off-site indoor sports and leisure facilities. 	Comment noted	
	<ul style="list-style-type: none"> Disagree with the application of local standards for sports provision. The policy should define what local provision is needed depending on the size of the development in accordance with the adopted Playing Pitch Strategy (PPS). 	The local standards have been derived taking into account an audit of current provision, local surveys and the views of stakeholders including Sport England. The local standards set out in policy DHC7 are based on size per 1000 population and therefore the provision will be dependent upon the size of the development. The provision of playing pitches will be in accordance with the Playing Pitch Strategy (EB43).	
	Policy wording modifications:		
	<ul style="list-style-type: none"> The policy should define the required local provision depending on the size of the development, in accordance with the adopted Playing Pitch Strategy (PPS). 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.	
Wessex Water (280)	<ul style="list-style-type: none"> Recommend that further assessment is carried out with Wessex Water on the impact of the new settlement proposed at Sharpness on the existing WwTW. If the foul flows from the new settlement are to be treated at the Sharpness WwTW this represents a significant increase in flows. An appraisal will be required to assess whether capacity improvements will be possible within existing environmental constraints. 	The Infrastructure Delivery Plan (EB69) has assessed the infrastructure requirements for foul drainage and the policy criterion 11 seeks to ensure that the planning of the development reflects the requirements. "Adequate and timely infrastructure including off-grid measures such as constructed wetlands to tackle wastewater generated by the development." Further discussions are welcome.	
Natural England	<ul style="list-style-type: none"> Support and agree with the HRA report conclusions 	Comment noted	



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
(864)	regarding this allocation.	
	<ul style="list-style-type: none"> The suite of mitigation measures included in the policy requirements will be sufficient to address localised impacts from large amounts of housing in a single location. 	Comment noted
	<ul style="list-style-type: none"> Contributions towards the updated Severn Estuary strategic mitigation scheme will be sufficient to address risks relating to recreation impacts on the Severn Estuary SAC/SPA/Ramsar and ensure adverse effects alone or in-combination with other developments are addressed. 	Comment noted
Policy wording modifications: None		
SF Planning Ltd for Gloucestershire County Council Asset Management & Property Services (GCC AMPS) (882)	<ul style="list-style-type: none"> Confirm availability of GCC AMPS land for delivery independently or as part of wider PS36 allocation. 	Comment noted
	<ul style="list-style-type: none"> Acceptable location for future residential development. 	Comment noted
	Policy wording modifications: None	
Ridge and Partners LLP for Sharpness Development LLP (932) Site promoter	<ul style="list-style-type: none"> Opportunity to deliver a self-sustaining new community with associated infrastructure, employment, services and facilities. 	Comment noted
	<ul style="list-style-type: none"> New infrastructure will be at a scale to benefit the immediate and wider area. 	Comment noted
	<ul style="list-style-type: none"> Designed to allow sustainable future planned growth and certainty beyond 2040. 	Comment noted
	<ul style="list-style-type: none"> Housing to be delivered through a series of interlinked neighbourhood areas. 	Comment noted
	<ul style="list-style-type: none"> Vision document and accompanying technical reports demonstrate that there are no insurmountable constraints that would restrict the delivery of the proposals and that there are viable and feasible solutions to mitigate the impacts of development. 	Comment noted



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<ul style="list-style-type: none"> Phase 1 projected delivery rates readily achievable and potentially could be exceeded. 	Comment noted
	Policy wording modifications:	
	<ul style="list-style-type: none"> 1. At least Approximately 2,400 dwellings by 2040 (approximately 5,000 by 2050 subject to Local Plan Review), including 720 affordable dwellings (30%), to address tenure, type and size of dwellings needed within the District and Berkeley Cluster areas. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
	<ul style="list-style-type: none"> 12. Zero carbon energy generation to meet the needs of the community which should include green energy sources such as including small-medium wind turbines, solar farms and biomass production. 	
	<ul style="list-style-type: none"> Update the supporting text to include: The area to which this policy relates (site PS36) will be subject to an early partial local plan review within five years of the date of adoption of the plan. This will allow the Council to address any additional evidence regarding the need and potential for further development in this area and in particular to ascertain whether necessary infrastructure has become available to allow additional land to be brought forward to meet local housing need. 	
	<ul style="list-style-type: none"> Update the site allocation boundary in accordance with P16-0821_14-3T Phase 1 & 2 Redline Dated: 21/07/2021 	
Environment Agency (933)	<ul style="list-style-type: none"> No objections to PS36 Sharpness New Settlement allocation. 	Comment noted
	<ul style="list-style-type: none"> Welcome provision of new nature reserve with benefits for local wildlife and wider Severn Estuary SPA/SAC/Ramsar site. 	Comment noted
	<ul style="list-style-type: none"> Welcome policy criterion 9 for the provision of planted structural landscaping buffers linking with existing GI, subject to sensitive use of appropriate 	Comment noted



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<p>species.</p> <ul style="list-style-type: none"> • Potential increased risk of failure and overtopping behind existing flood defence line due to climate change and natural deterioration of the flood risk management assets. • Future opportunities to manage risks, to adapt to sea level rise and to deliver habitats that could compensate for coastal squeeze. • Further evidence required at development management stage regarding adaptation to pressures of rising sea levels and appropriate future management options: <ul style="list-style-type: none"> ○ More vulnerable developments located in Flood Zone 1 for 2121. ○ Land in Flood Zone 3 used for water compatible development. ○ 	A master plan will be required to address a positive strategy for mitigating flood risk including attenuating and disposing of surface water through sustainable drainage systems (SuDS) that can form part of the GI network.
Policy wording modifications: None		
Pegasus Group for Whitecroft Education Trust (939)	<ul style="list-style-type: none"> • Support identification of PS36 Sharpness New Settlement for development 	Comment noted
Policy wording modifications: None		
Object		
Gloucester Harbour Trustees (99)	<ul style="list-style-type: none"> • Critical navigation point on the Severn Estuary where the main navigational channel is close to shore and severely restricted and where inbound commercial ships begin a complex manoeuvre to enable them to dock at the port of Sharpness. 	The built forms of development will be located well away from the navigational channel and can be designed to reduce light pollution at the planning application stage.
	<ul style="list-style-type: none"> • Impact of light pollution on leading light navigational aids within the estuary and hazard to shipping. 	The built forms of development will be located well away from the navigational channel and can be designed to reduce light pollution at the planning application stage.
	<ul style="list-style-type: none"> • Further consultation required regarding effects on vessel navigation and safety in the estuary. 	Further consultation is welcomed to ensure that detailed designs take account of the requirements of navigating vessels.



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	Policy wording modifications: None	
Hinton Parish Council (258 & 302)	<ul style="list-style-type: none"> Scale of development, increased commuting, heavy traffic and associated air pollution is contrary to declared Climate emergency. 	The scale of development will create a level of self-containment and reduce the need to travel. The development will result in a significant increase in biodiversity rich habitat and will be constructed according to net carbon zero standards.
	<ul style="list-style-type: none"> Loss of greenfields and associated major impact on the environment, including SSSI extending south to Thornbury. 	The development needs of the District cannot be met purely on brownfield land. The development will mitigate any impacts on the Severn Estuary and is supported by Natural England.
	<ul style="list-style-type: none"> Undemocratic process for approving Draft Plan at the Full Council meeting on 29 April 2021, prior to whole Council elections on 6 May 2021. 	The SDLP was approved according to Council procedures.
	<ul style="list-style-type: none"> Local schools at capacity. 	The development will provide for additional schools.
	<ul style="list-style-type: none"> Remote from Gloucestershire Industrial growth area with poor connectivity. 	The site is adjacent to the Gloucestershire Science and Technology Park at Berkeley and Sharpness Docks and Severnside Distribution Park, which are important employment locations for the District.
	<ul style="list-style-type: none"> Lack of employment opportunities, due to isolation, contrary to Garden Village principles 	The site is adjacent to the Gloucestershire Science and Technology Park at Berkeley and Sharpness Docks and Severnside Distribution Park, which are important employment locations for the District and the site will deliver an additional 10 hectares of employment growth.
	<ul style="list-style-type: none"> Absence of a realistic public transport option. 	The Council's Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> Significant doubts over proposed rail link. 	The evidence from the site promoters (932 and EB95) demonstrates that the site has credible proposals for reopening the existing railway branch line to passenger services.
	<ul style="list-style-type: none"> No direct rail link south to Bristol. 	Comment noted. However, a combination of bus and coach services and a rail service via Cam & Dursley southwards will provide suitable public transport options to Bristol.
	<ul style="list-style-type: none"> M5 Junction 14 at capacity. 	A number of sites will impact on M5 Junction 14, in addition to growth within South Gloucestershire and a funding and delivery strategy is being developed.
<ul style="list-style-type: none"> Wider strategic and local network inadequate to cope with additional traffic, including A38. 	The site has been modelled within the Traffic Forecasting Study (EB61) and mitigation measures identified. Ahead of the EIP, the Council is updating its	



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
		transport evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> Potential expansion of HSE consultation distance for ammonium nitrate storage at Sharpness Docks following Beirut enquiry. 	It is important that proposals are based on current planning policy. The current HSE consultation distance for ammonium nitrate at Sharpness Docks does not impact materially upon the allocation.
	<ul style="list-style-type: none"> Better located alternative sites at Moreton Valence and Whitminster. 	Sites at Moreton Valence and Whitminster were assessed at the Alternative Option stage in 2020 and do not perform better than this site at meeting the Plan's objectives in a sustainable way.
	<ul style="list-style-type: none"> Lack of public engagement and community involvement in the Local Plan Review process. 	The Council has included roadshows through the various stages of SDLP consultation including events at Berkeley and Sharpness. There have been many opportunities to become involved.
	Policy wording modifications: None	
Berkeley Vale Climate Action Network (374)	<ul style="list-style-type: none"> Proposed fast rail and coach links not viable and unlikely to be delivered. 	The Council's Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> Strategic road network, including M5, M5 Junction 14 and A38, inadequate to cope with additional traffic. 	The site has been modelled within the Traffic Forecasting Study (EB61) and mitigation measures identified. Ahead of the EIP, the Council is updating its transport evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> Housing growth concentrated in the south of the District unrelated to prime area for business growth around Gloucester and Cheltenham. 	The SDLP includes development at most locations throughout the District, except major development in the Cotswolds AONB, which would be contrary to national policy.
	<ul style="list-style-type: none"> Increased commuting to work, traffic congestion and consequent emissions. 	The scale of development will create a level of self-containment and reduce the need to travel. The site has been modelled within the Traffic Forecasting Study (EB61) and mitigation measures identified.
	<ul style="list-style-type: none"> Flood risk from increased heavy rainfall, more severe storms, increasing sea levels and River Severn channelling effect. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage. The site promoters have provided additional evidence (932 and EB95). The Environment Agency has no objections.
	<ul style="list-style-type: none"> Impact on sewage and wastewater management from increased flood risk from rainfall and rising sea levels. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage. The site promoters have provided additional evidence (932 and EB95). The Environment Agency has no objections.



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<ul style="list-style-type: none"> Conflicts with the Government's legally binding commitment to be net-zero by 2050 and Local Plan standards of sustainability and carbon neutrality. 	The intention is that the development will assist with the Council's carbon reduction policies by being an exemplar development.
Policy wording modifications: None		
Hamfallow Parish Council (419)	<ul style="list-style-type: none"> Recognise the need for new housing and the need to plan to meet the Government's housing requirement. 	Comment noted
	<ul style="list-style-type: none"> Accept that most communities must accept some further development to deliver overall housing requirement. 	Comment noted
	<ul style="list-style-type: none"> PS36 is disproportionate in scale to the existing communities of Berkeley and Sharpness/ Newtown. 	The development is a proposed new settlement which is different in scale to the existing communities, but will be complementary to those settlements by providing for a step change in public transport, commercial, community and green infrastructure provision.
	<ul style="list-style-type: none"> Urbanisation and loss of character of predominantly rural area. 	The development is a proposed new settlement which will alter the character of the immediate area, but will complement both the adjacent industrial and rural areas by providing a range of new services and facilities to replace those which have been lost over the years.
	<ul style="list-style-type: none"> 'Garden Village' is intentionally misleading. 	The SDLP clearly sets out garden city principles on page 31 and sets out in Policy PS36 how the new development is expected to conform to this definition.
	<ul style="list-style-type: none"> Site identification at Emerging Strategy stage contrary to Issues and Options consultation findings. 	The results of public consultation at the issues and options stage clearly favoured a development strategy based on concentrated growth rather than dispersal.
	<ul style="list-style-type: none"> Lack of evidence of attractiveness of area for business growth and investment and increased local employment. 	The site is adjacent to the Gloucestershire Science and Technology Park at Berkeley and Sharpness Docks and Severnside Distribution Park, which are important employment locations for the District which have received investment recently. The SDLP acknowledges that the area requires additional regeneration and investment and a new settlement, together with other proposals, such as the STEP project, provide the means to kick start that investment.
	<ul style="list-style-type: none"> Remote from good road infrastructure. 	The site is not remote from good road infrastructure. The road network around Sharpness and Berkeley is designed to facilitate HGV access to Sharpness Docks and is of a good overall quality. The main A38 is 5 to 7



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
		minutes' drive from the site.
	<ul style="list-style-type: none"> • M5/ A38 corridor and M5 Junctions 13 and 14 inadequate to cope with additional traffic. <ul style="list-style-type: none"> ○ Requires full costings and commitment to delivery of necessary improvements to M5 Junctions 13 and 14, completion of the Berkeley bypass and roundabouts onto the A38 	The site has been modelled within the Traffic Forecasting Study (EB61) and mitigation measures identified. Ahead of the EIP, the Council is updating its transport evidence base and documentation, including producing a funding and delivery strategy, which will be published in due course.
	<ul style="list-style-type: none"> • Question Sustainable Transport Assessment findings: <ul style="list-style-type: none"> ○ Largest development gives greatest traffic reduction capacity? ○ A4066 and Breadstone junctions just below full capacity? ○ Projected level of traffic reduction from modal shift unlikely and unsupported by evidence from strategic transport provision stakeholders. ○ Aspirational but unrealistic measures to achieve modal shift, including rail link. ○ Should require the commitment of public transport providers (Stagecoach, Network Rail etc) to provide a high level of service to the development from the start of build to 10 years after completion. 	The Council's Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services. Ahead of the EIP, the Council is updating its transport evidence base and documentation, including producing a funding and delivery strategy, which will be published in due course.
	<ul style="list-style-type: none"> • Difficult to access employment provision in industrial and retail parks across Bristol, Gloucester and Cheltenham through public transport. 	The promoters are looking at new forms of bus and coach services which will improve access to key employment destinations.
	<ul style="list-style-type: none"> • Viability and deliverability of public transport provision within the Plan period to 2040, not supported by strategic transport provision stakeholders. 	The Council's Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> • History of flooding and increased future flood risk from more frequent flooding anticipated in reasonable climate change scenarios. <ul style="list-style-type: none"> ○ Northern land parcel at risk from 1 in 100 flood 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage. The site promoters have provided additional evidence (932 and EB95). The Environment Agency has no objections.



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<ul style="list-style-type: none"> event on the River Severn. ○ South west part of site at risk of flooding from River Avon. ○ Requires assessment of flood risk as less than 1/1000 years in accepted climate change scenarios over the next 100 years. 	
	<ul style="list-style-type: none"> ● Requires commitment of the key infrastructure providers, ie Wessex Water, Severn Trent Water, Western Power, BT, Gigaclear etc to provide the necessary infrastructure for the full development before or as it is built: <ul style="list-style-type: none"> ○ Includes necessary commitment from Western Power to provide rapid electric car charging points for each dwelling. 	The Infrastructure Delivery Plan (EB69) has assessed the infrastructure requirements and the policy seeks to ensure that the planning of the development reflects the requirements.
	<ul style="list-style-type: none"> ● Loss of over 1,000 acres of valuable agricultural land inconsistent with climate emergency and sustainable development. 	The land does not contain high value agricultural land and most of the land will be repurposed for green infrastructure and biodiversity purposes, resulting in a net biodiversity gain.
	<ul style="list-style-type: none"> ● Mitigation measures inadequate to compensate for encroachment from development and associated pressures on the Severn Estuary SAC, SPA and RAMSAR. <ul style="list-style-type: none"> ○ Should require full protection of the Severn Estuary SPA, SAC and Ramsar sites without diversion of the Severn Way footpath. 	The development will mitigate any impacts on the Severn Estuary and is supported by Natural England.
	<ul style="list-style-type: none"> ● Impact of proposed inland diversion of Severn Way and loss of amenity. 	The priority in this location is to provide mitigation measures to protect the purposes for designating the Severn Estuary - a SPA, SAC and RAMSAR site. Recreation impacts from visitors will require diversions of routes but the overall result will be measures which enhance local amenity as well as local biodiversity.
	<ul style="list-style-type: none"> ● Significant reduction in air quality as a result of additional traffic contrary to Sustainability Appraisal 	There is no evidence provided that there will be a significant reduction in air quality below acceptable levels.



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	evidence.	
	<ul style="list-style-type: none"> Impacts of proximity to Nuclear Decommissioning site at Berkeley on emergency planning, residential amenity/ market attractiveness and associated viability implications for delivery of infrastructure. <ul style="list-style-type: none"> Should require inclusion in Gloucestershire County Council's emergency response plan for the Berkeley Nuclear Site under the REPPiR 2019. 	There is no evidence that proximity to the Nuclear Decommissioning site at Berkeley will impact materially on emergency planning, residential amenity/ market attractiveness and associated viability matters for the delivery of infrastructure.
	<ul style="list-style-type: none"> Safety concerns from proximity to ammonium nitrate storage facility at Sharpness Docks and potential explosion hazard. 	The current HSE consultation distance for ammonium nitrate at Sharpness Docks does not impact materially upon the allocation.
Policy wording modifications: None		
Berkeley Town Council (477)	<ul style="list-style-type: none"> Support the position of BaSRAG. 	Comment noted
	<ul style="list-style-type: none"> Cost of infrastructure provision, including Severn Estuary mitigation measures, unviable. 	The Council's Infrastructure Delivery Plan (EB69) and Council's Viability Assessment (May 2021) (EB70), together with statements from the promoters (932 and EB95) demonstrate that the site is deliverable.
	<ul style="list-style-type: none"> Unrealistic public transport provision plans and delayed timescale for delivery. 	The Council's Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> Berkeley bypass and M5 Junction 14 inadequate to cope with additional traffic. 	The road network around Sharpness and Berkeley is designed to facilitate HGV access to Sharpness Docks and is of a good overall quality. The site has been modelled within the Traffic Forecasting Study (EB61) and mitigation measures identified.
	<ul style="list-style-type: none"> Air pollution from additional car use contrary to SDC Carbon Neutral 2030 commitment. 	The scale of development will create a level of self-containment and reduce the need to travel. The site will bring forward extensive biodiversity net gain and sustainable construction methods to achieve net carbon zero development.
	<ul style="list-style-type: none"> Impact of additional traffic noise from Berkeley bypass on residential amenity at Canonbury Rise and proposed Local Site Allocation PS33. 	Development adjacent to the Berkeley bypass should include any necessary acoustic landscaping buffer as necessary to address traffic along the bypass which is within the design capacity of the road.
	<ul style="list-style-type: none"> Local secondary schools at capacity and no new 	The SDLP identifies a new secondary school to be delivered during phase 1



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	secondary school provision in early phases of development.	by 2040. This will benefit not only the new community but the existing population of Berkeley/Sharpness who currently have to travel outside of the area for secondary schooling.
	<ul style="list-style-type: none"> No planned dental or social care services to cater for additional demand. 	The SDLP requires the development to provide a local centre, incorporating a surgery and other community uses to meet the needs of the development. The local centre could accommodate a dental practice, which is a private business, if there is a demand. Policies CP7 and CP8 require major housing development to contribute to meeting identified long term needs in those communities the development relates to, including by providing sheltered housing (or Independent Living) and homes adapted to allow people to live at home for as long as possible.
	<ul style="list-style-type: none"> Remote location with a lack of local employment contrary to Garden Village principles. 	The site is not remote either from a main town (adjacent to Berkeley a tier 2 settlement), nor employment areas (at Berkeley and Severnside/Sharpness) nor from the A38 (5-7 mins drive).
	<ul style="list-style-type: none"> Loss of over 1,000 acres of greenfield agricultural land. 	Most of the site will be developed for green infrastructure uses including nature reserve and open space. The development will result in significant biodiversity net gain.
	<ul style="list-style-type: none"> Impact on SSSI, SAC, SPA and Ramsar site from development and associated pressures. 	The development will mitigate any impacts on the Severn Estuary and is supported by Natural England.
	<ul style="list-style-type: none"> Flood risk including area near the estuary identified as Flood Zone 3. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage. The site promoters have provided additional evidence (932 and EB95). The Environment Agency has no objections.
	<ul style="list-style-type: none"> Logistical difficulties of housing delivery within the plan period. 	Developing a new settlement will take time but there is no evidence that the site will be faced with serious logistical issues.
	<ul style="list-style-type: none"> Question Government algorithm for apportioning housing numbers. 	This is Government policy and local plans are required to meet this national policy.
	Policy wording modifications: None	
The Canal & River Trust (496)	<ul style="list-style-type: none"> The additional usage of the canal towpath by future residents of this and other development within Sharpness has the potential to result in degradation of the towpath. 	Criteria 16 includes a requirement for “contributions towards the enhancement of off-site walking and cycling routes to key destinations including to Berkeley GREEN, Newtown /Sharpness and Berkeley town centre and linking to the national cycle and canal networks” and this will include enhancements to the canal towpath, where necessary.



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	Policy wording modifications:	
	<ul style="list-style-type: none"> Amend policy criteria 16 to include a contribution to improvement of the canal towpath. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
SDC Cllr Haydn Jones (500)	<ul style="list-style-type: none"> Disproportionate scale of development. 	The most sustainable pattern of development involves a level of concentration rather than dispersal of development. The quantum of the housing requirement requires new growth points due to the level of constraints at the main towns.
	<ul style="list-style-type: none"> Allocation based on false assumptions. 	The development is not based on false assumptions.
	<ul style="list-style-type: none"> Contrary to expressed wishes of local residents at all consultation stages. 	The results of public consultation at the issues and options stage clearly favoured a development strategy based on concentrated growth rather than dispersal.
	<ul style="list-style-type: none"> Remote location with poor transport links. 	The site is not remote either from a main town (adjacent to Berkeley a tier 2 settlement), nor employment areas (at Berkeley and Severnside/Sharpness) nor from the A38 (5-7 mins drive). The road network around Sharpness and Berkeley is designed to facilitate HGV access to Sharpness Docks and is of a good overall quality. There are realistic opportunities to improve public transport links to the area, including by rail.
	<ul style="list-style-type: none"> No guarantees for delivery of railway link, a critical sustainable development component. <ul style="list-style-type: none"> Recent bids for funding under the Governments 'Reopening Your Railways' fund have been rejected. Confirmation of funding and delivery of a viable passenger service, including agreement from Network Rail, should be a pre-requisite for PS36. 	The evidence from the site promoters (932 and EB95) demonstrates that the site has credible proposals for reopening the existing railway branchline to passenger services. The recent bid for funding under the Government's 'Reopening Your Railways' fund was unsuccessful primarily because it was predicated on growth which at the time was not in an adopted local plan.
	<ul style="list-style-type: none"> No evidence to back up limited out-commuting assumptions and potential internalisation of proposed new settlement for employment and recreation. <ul style="list-style-type: none"> Employment land has been available and marketed at Sharpness for over thirty years without significant uptake. 	The scale and type of development (e.g. secondary school and employment) will create a level of self-containment and reduce the need to travel. Evidence is set out in the Council's Sustainable Transport Strategy (EB60a-c) and material from the site promoters (932 and EB95). Ahead of the EIP, the Council is updating its transport evidence base and documentation. This will be published in due course.
<ul style="list-style-type: none"> Strategic traffic modelling, including capacity of M5 	A number of sites will impact on M5 Junction 14, in addition to growth	



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	Junction 14, should include proposed development at Thornbury, Buckover and relevant areas of South Gloucestershire.	within South Gloucestershire and a funding and delivery strategy is being developed.
	<ul style="list-style-type: none"> Should include a pre-requisite requirement to deliver the missing link between the A4066 and A38. 	The site has been modelled within the Traffic Forecasting Study (EB61) and mitigation measures identified including to the B4066 and Alkington Lane.
	<ul style="list-style-type: none"> Site selection not justified against reasonable alternatives PGP1 and PGP2 sites in Additional Housing Options consultation October 2020. 	Sites at Moreton Valance and Whitminster were assessed at the Alternative Option stage in 2020 and do not perform better than this site at meeting the Plan's objectives in a sustainable way.
	Policy wording modifications: None	
Berkeley and Sharpness Residents' Action Group (BaSRAG) (538)	<ul style="list-style-type: none"> Not in the right place to create sustainable development contrary to identified Local Plan Priority issue 2:- <ul style="list-style-type: none"> Not located where there is currently the best access to services, facilities, jobs and infrastructure; Outside the key movement corridor of the A38/M5; Not consistent with concentrating employment growth within the A38/M5 corridor and at locations in tandem with housing growth. 	Topic Paper: The Development Strategy October 2021 (EB4) and Topic Paper: Assessment and selection of sites (EB9) set out the Council's approach to identifying and assessing potential spatial strategy options and site options and how the development strategy was selected to meet requirements. The site fits within the preferred hybrid strategy approach, meets the strategy objective of regenerating the Berkeley/Sharpness area, is well located adjacent to services and facilities at tier 2 and tier 3a settlements, is adjacent to a good local road network with the A38 only 5-7 mins drive away and located adjacent to employment areas in Berkeley and Sharpness with opportunities to grow the GREEN focus in accordance with GFirstLEP's Local Industrial Strategy. The site offers the opportunity for a step change in local facilities and services for existing and new communities.
	<ul style="list-style-type: none"> Design does not adequately address environmental harm. 	The development will mitigate any impacts on the Severn Estuary and is supported by Natural England. The new green infrastructure and nature reserve will offer positive benefits to local wildlife and people.
	<ul style="list-style-type: none"> Extensive infrastructure requirements with high risk to viability and deliverability. 	The Council's Infrastructure Delivery Plan (EB69) and Council's Viability Assessment (May 2021) (EB70), together with statements from the promoters (932 and EB95) demonstrate that the site is deliverable.
	<ul style="list-style-type: none"> No policy guarantees or safeguards for delivery of promised Garden City design, infrastructure, transport and appropriate amenities. 	The policy sets out the requirements clearly and puts in place mechanisms for delivery.
	<ul style="list-style-type: none"> Little or no community support. 	There is significant support for regeneration, new local employment opportunities within the area and for increasing community facilities and improving public transport.



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<ul style="list-style-type: none"> Poor economic potential in relation to more established towns in Stroud and the Gloucester – Cheltenham promoted focus of the Gloucestershire LEP economic strategy. 	The GFirstLEP has invested millions of pounds in the Berkeley GREEN project and Science and Technology Park and economic regeneration of the area is fully supported by GFirstLEP, Canals & Rivers Trust, Western Gateway, GCC and other organisations – see the STEP Severn Gateway proposal, for example.
	<ul style="list-style-type: none"> Unlikely to achieve a decent degree of employment self-containment. 	The vision for the new settlement, together with other regeneration proposals in the area will create a level of employment self-containment within the area.
	<ul style="list-style-type: none"> Poor access to nearby larger towns. 	The development is looking to achieve a level of self-containment. Whilst proposals will improve public transport access to larger towns, providing easy (road) access to nearby larger towns runs counter to this objective.
	<ul style="list-style-type: none"> Out-commuting likely to continue or worsen. 	The development is looking to achieve a level of self-containment.
	<ul style="list-style-type: none"> Concerns over plan making process conducted by SDC. 	The plan making process has been logical, systematic and comprehensive.
	<ul style="list-style-type: none"> Additional supporting information a: Objection to SA - Key concerns: <ul style="list-style-type: none"> Conflates Phases 1 and 2 of the site allocation PS36, rather than considering the potential sustainability of PS36 (Phase 1) as presented in the pre-submission Draft Local Plan; Is inconsistent in scoring in relation to PS36 - considering the potential sustainability at the conclusion of Phases 1 and 2 interchangeably, presenting the 'optimal' result to support positive scoring; Does not consider site allocations on a 'like for like' basis – none of the other strategic sites are considered for their sustainability beyond the plan period; Is inconsistent in the appraisal method: with some appraisals considering policy implications and others being policy agnostic; Does not appraise impact on education facilities, 	<p>The Sustainability Appraisal Report (CD3) provides a thorough, comprehensive and independent assessment of the sustainability of the SDLP.</p> <p>The assessment of Sharpness new settlement has had regard to the NPPF, which states that in relation to new settlements, “policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”</p> <p>The assessment of all site options has followed a detailed methodology and the SA sets out in a comprehensive manner the results for all potential sites.</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<p>which will be significant considering the strategy adopted by Stroud District Council to deliver volume housing via large sites, requiring infrastructure and community investment;</p> <ul style="list-style-type: none"> ○ Does not adequately consider mitigation, in particular in relation to recommendations within the Habitat Regulations Assessment; and ○ Is reliant on assessment methods which are questionable in their accuracy and consistency. 	
	<ul style="list-style-type: none"> ● Additional supporting information b: Detailed objection to PS36 - Key areas of concern: <ul style="list-style-type: none"> ○ Infrastructure ○ Transport ○ Employment ○ Environment and surroundings ○ Deliverability and construction 	<p>The Infrastructure Delivery Plan (EB69) has assessed the infrastructure requirements and the policy seeks to ensure that the planning of the development reflects the requirements.</p> <p>The Council's Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.</p> <p>The site is located adjacent to employment areas in Berkeley and Sharpness with opportunities to grow the GREEN focus in accordance with GFirstLEP's Local Industrial Strategy.</p> <p>The development will mitigate any impacts on the Severn Estuary and is supported by Natural England. The new green infrastructure and nature reserve will offer positive benefits to local wildlife and people.</p> <p>The Council's Infrastructure Delivery Plan (EB69) and Council's Viability Assessment (May 2021) (EB70), together with statements from the promoters (932 and EB95) demonstrate that the site is deliverable.</p>
	Policy wording modifications: None	
SDC Cllr Gordon Craig (665)	<ul style="list-style-type: none"> ● Remote from areas of significant employment and unlikely to support Gloucestershire vision for 2050 employment strategy. 	The site is located adjacent to employment areas in Berkeley and Sharpness with opportunities to grow the GREEN focus in accordance with GFirstLEP's Local Industrial Strategy.
	<ul style="list-style-type: none"> ● Significant uncertainty over proposed rail link north and express commuter coach service south to deliver required public transport improvements. 	The Council's Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<ul style="list-style-type: none"> Adverse impact on Severn Estuary SAC, SPA and Ramsar sites, including increased recreational pressure. 	The development will mitigate any impacts on the Severn Estuary and is supported by Natural England. The new green infrastructure and nature reserve will offer positive benefits to local wildlife and people.
	<ul style="list-style-type: none"> Impact on and re-routing of Severn way. 	The priority in this location is to provide mitigation measures to protect the purposes for designating the Severn Estuary - a SPA, SAC and RAMSAR site. Recreation impacts from visitors will require diversions of routes but the overall result will be measures which enhance local amenity as well as local biodiversity.
	<ul style="list-style-type: none"> Proximity to ammonium nitrate storage facility at Sharpness and potential expansion of associated HSE consultation area following the Beirut enquiry. 	The current HSE consultation distance for ammonium nitrate at Sharpness Docks does not impact materially upon the allocation.
	<ul style="list-style-type: none"> Risk of coalescence between Sharpness/ Newtown/ Brookend/ Wanswell/ Berkeley and loss of historic character and identity. 	Phase 1 proposals within this SDLP will not result in coalescence between these areas.
	<ul style="list-style-type: none"> Alternative sites available at Moreton Valence and Whitminster. 	Sites at Moreton Valence and Whitminster were assessed at the Alternative Option stage in 2020 and do not perform better than this site at meeting the Plan's objectives in a sustainable way.
	Policy wording modifications: None	
Walking Berkeley Vale's Endangered Byways (731)	<ul style="list-style-type: none"> Undemocratic process for approving Draft Plan at the Full Council meeting on 29 April 2021, prior to whole Council elections on 6 May 2021. 	The SDLP was approved according to Council procedures.
	<ul style="list-style-type: none"> Lack of public engagement and community involvement in the Local Plan Review process. 	The Council has included roadshows through the various stages of SDLP consultation including events at Berkeley and Sharpness. There have been many opportunities to become involved.
	<ul style="list-style-type: none"> Sporadic and late publication of evidence base document's including HRA and SFRA. 	The Council has published documents as they become available during the SDLP process.
	<ul style="list-style-type: none"> Significant fluvial and coastal flood risk exacerbated by loss of natural environment flood defences. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage. The site promoters have provided additional evidence (932 and EB95). The Environment Agency has no objections.
	<ul style="list-style-type: none"> Contrary to SDC carbon neutral 2030 commitment. 	The scale of development will create a level of self-containment and reduce the need to travel. The site will bring forward extensive biodiversity net gain and sustainable construction methods to achieve net carbon zero



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
		development.
	<ul style="list-style-type: none"> Impacts on Severn Estuary SAC/ SPA/ Ramsar and SSSI from development and associated recreational pressures. 	The development will mitigate any impacts on the Severn Estuary and is supported by Natural England. The new green infrastructure and nature reserve will offer positive benefits to local wildlife and people.
	<ul style="list-style-type: none"> Re-routing of the Severn Way national walking trail away from the Severn Estuary. 	The priority in this location is to provide mitigation measures to protect the purposes for designating the Severn Estuary - a SPA, SAC and RAMSAR site. Recreation impacts from visitors will require diversions of routes but the overall result will be measures which enhance local amenity as well as local biodiversity.
	<ul style="list-style-type: none"> Remote location with limited access to public transport. 	The site is not remote either from a main town (adjacent to Berkeley a tier 2 settlement), nor employment areas (at Berkeley and Severnside/Sharpness) nor from the A38 (5-7 mins drive). There are realistic opportunities to improve public transport links to the area, including by rail.
	<ul style="list-style-type: none"> Significant doubt over viability and provision of proposed rail link. 	The Council's Infrastructure Delivery Plan (EB69) and Council's Viability Assessment (May 2021) (EB70), together with statements from the promoters (932 and EB95) demonstrate that the site is deliverable. There are realistic opportunities to improve public transport links to the area, including by rail.
	<ul style="list-style-type: none"> Scale of development disproportionate to needs and requirements of local area and wider district. 	Topic Paper: The Development Strategy October 2021 (EB4) and Topic Paper: Assessment and selection of sites (EB9) set out the Council's approach to identifying and assessing potential spatial strategy options and site options and how the development strategy was selected to meet requirements. The site fits within the preferred hybrid strategy approach, meets the strategy objective of regenerating the Berkeley/Sharpness area, is well located adjacent to services and facilities at tier 2 and tier 3a settlements.
	<ul style="list-style-type: none"> Urbanisation and loss of character of predominantly rural area. 	The scale of development required in Stroud District will of necessity involve developing new areas to accommodate the housing needs. The full impacts of development are assessed in the Sustainability Appraisal (CD3) and Sharpness new settlement will provide a high quality development which will enhance the services and facilities available within the local area.
Policy wording modifications: None		
Gloucestershire	<ul style="list-style-type: none"> Impact on 27 footpaths through diversions, 	The development will incorporate existing footpaths within new green



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
Ramblers, South Cotswold Group (793)	<p>extinguishments or changes of use.</p> <ul style="list-style-type: none"> ○ Loss of rural experience to urban environment walks. ○ Change of use of a footpath to a bridleway is not considered an enhancement. 	infrastructure corridors and will extend the walking and cycling network within the area.
	<ul style="list-style-type: none"> ● Re-routeing of Severn Way national trail. <ul style="list-style-type: none"> ○ Should remain alongside the river. ○ Potential to provide alternative routes for times when the path may be flooded. 	The priority in this location is to provide mitigation measures to protect the purposes for designating the Severn Estuary - a SPA, SAC and RAMSAR site. Recreation impacts from visitors will require diversions of routes but the overall result will be measures which enhance local amenity as well as local biodiversity.
	<ul style="list-style-type: none"> ● Proposed walking-cycling routes should include provision for cycles as vehicles, separated from pedestrians with adequate passing width is provided. 	The latest Government standards for walking and cycling routes recommend that they are segregated and the development will incorporate the latest standards.
	Policy wording modifications: None	
Berkeley Vale Tourism (840)	<ul style="list-style-type: none"> ● Impacts on The Berkeley Vale as a National and county level commercial tourism opportunity including: <ul style="list-style-type: none"> ○ Canal ○ Berkeley Castle ○ Slimbridge Wildfowl and Wetlands Trust ○ The Severn Bore ○ Countryside walking and cycling ○ Historic Sharpness Docks 	The development will enhance local tourism opportunities by facilitating the restoration of the Berkeley branchline to passenger services. The site promoters are working with the Berkeley Vale Heritage Railway. The SDLP includes separate proposals to enhance the historic Sharpness Docks for tourism and leisure purposes. The development will have no impact on the other tourist attractions listed.
	<ul style="list-style-type: none"> ● Better located alternative sites at Moreton Valence and Whitminster. 	Sites at Moreton Valence and Whitminster were assessed at the Alternative Option stage in 2020 and do not perform better than this site at meeting the Plan's objectives in a sustainable way.
	<ul style="list-style-type: none"> ● Remote from key employment centres with inadequate transport infrastructure. 	The site is located adjacent to employment areas in Berkeley and Sharpness with opportunities to grow the GREEN focus in accordance with GFirstLEP's Local Industrial Strategy.
	<ul style="list-style-type: none"> ● Significant uncertainty regarding rail link. 	The road network around Sharpness and Berkeley is designed to facilitate HGV access to Sharpness Docks and is of a good overall quality. There are realistic opportunities to improve public transport links to the area,



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
		including by rail.
	<ul style="list-style-type: none"> Habitat impacts above a level considered possible of mitigation. 	The development will mitigate any impacts on the Severn Estuary and is supported by Natural England. The new green infrastructure and nature reserve will offer positive benefits to local wildlife and people.
Policy wording modifications: None		
Pegasus Group for Robert Hitchens Ltd (879)	<ul style="list-style-type: none"> Unsustainable location, distant from main movement corridors and major employment centres. 	Topic Paper: The Development Strategy October 2021 (EB4) and Topic Paper: Assessment and selection of sites (EB9) set out the Council's approach to identifying and assessing potential spatial strategy options and site options and how the development strategy was selected to meet requirements. The site fits within the preferred hybrid strategy approach, meets the strategy objective of regenerating the Berkeley/Sharpness area, is well located adjacent to services and facilities at tier 2 and tier 3a settlements, is adjacent to a good local road network with the A38 only 5-7 mins drive away and located adjacent to employment areas in Berkeley and Sharpness with opportunities to grow the GREEN focus in accordance with GFirstLEP's Local Industrial Strategy. The site offers the opportunity for a step change in local facilities and services for existing and new communities.
	<ul style="list-style-type: none"> No potential as a sustainable location: <ul style="list-style-type: none"> Unlikely to deliver significant self-containment within the plan period; Unlikely to deliver required public transport provision. 	The scale of development will create a level of self-containment and reduce the need to travel. The Council's Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> Contrary to Local Plan priority issues: <ul style="list-style-type: none"> moving the district towards becoming Carbon Neutral by 2030; concentrating housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure; concentrating employment growth within the A38/M5 corridor or in tandem with housing growth. 	Topic Paper: The Development Strategy October 2021 (EB4) and Topic Paper: Assessment and selection of sites (EB9) set out the Council's approach to identifying and assessing potential spatial strategy options and site options and how the development strategy was selected to meet requirements. The site will be an exemplar development in achieving net carbon zero development, fits within the preferred hybrid strategy approach, meets the strategy objective of regenerating the Berkeley/Sharpness area, is well located adjacent to services and facilities at tier 2 and tier 3a settlements, is adjacent to a good local road network with the A38 only 5-7 mins drive away and located adjacent to employment areas



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
		in Berkeley and Sharpness with opportunities to grow the GREEN focus in accordance with GFirstLEP’s Local Industrial Strategy.
	<ul style="list-style-type: none"> Scale of development and associated pressures in close proximity to the Severn Estuary SPA/ SAC Ramsar site and SSSI: <ul style="list-style-type: none"> ○ Uncertainty of effects on habitats. ○ Efficacy of proposed mitigation measures. ○ Fails to meet HRA legal duty 	The development will mitigate any impacts on the Severn Estuary and is supported by Natural England. The new green infrastructure and nature reserve will offer positive benefits to local wildlife and people. The sites does not fail to meet HRA legal duties.
	<ul style="list-style-type: none"> Table 6 Delivery of growth does not provide a housing trajectory showing anticipated dwellings per year included in the Plan. 	Table 6 shows, as for all strategic sites, a summary of the development trajectory by 5 year tranches. Topic Paper: Housing needs and supply (EB8) provides further information. Trajectories are based on annual expected delivery rates.
	<ul style="list-style-type: none"> Unrealistic delivery assumptions for housing delivery within the plan period. <ul style="list-style-type: none"> ○ No account of lead-in times for infrastructure provision in relation to housing delivery. 	Trajectories are based on annual expected delivery rates which are considered realistic. Account has been taken of lead-in times for infrastructure provision.
	<ul style="list-style-type: none"> Sustainability Appraisal: <ul style="list-style-type: none"> ○ Highlights potential lack of access to a wide range of facilities, services and public transport in early stages of the development of a new settlement. ○ SA7 Biodiversity - identifies potential adverse impacts on Severn Estuary SSSI/SPA/SAC/Ramsar site. ○ SA 16 Employment and SA17 Economic growth - identifies significant positive effects in direct conflict with Employment Land Review (ELR) evidence. 	<p>The Sustainability Appraisal Report (CD3) provides a thorough, comprehensive and independent assessment of the sustainability of the SDLP.</p> <p>The assessment of all site options has followed a detailed methodology and the SA sets out in a comprehensive manner the results for all potential sites.</p> <p>Each site will have a different combination of positive benefits and negative impacts. Having considered all of the relevant factors, Sharpness new settlement performs relatively well compared with reasonable alternatives.</p>
	<ul style="list-style-type: none"> Contrary to the Stroud Sustainable Transport Strategy (STS) for delivering growth where greatest benefits can be achieved in relation to movement corridors and sustainable transport choice. 	<p>The site is not contrary to the STS. The scale of development will create a level of self-containment and reduce the need to travel.</p> <p>GFirstLEP, through its Strategic Economic Plan and subsequent Local Industrial Strategy has invested in transport improvements and economic growth at Berkeley, within the M5 movement corridor.</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<ul style="list-style-type: none"> Public transport delivery, including rail link and coach-based public transport service, not supported by evidence or by strategic transport stakeholders. 	The Council's Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> Impacts on local and strategic highway network from likely increased car trips. 	The site has been modelled within the Traffic Forecasting Study (EB61) and mitigation measures identified. Ahead of the EIP, the Council is updating its transport evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> Traffic modelling evidence underplays impacts on the wider highway network. 	The Traffic Forecasting Study (EB61) and mitigation measures does not underplay impacts on the wider highway network.
	<ul style="list-style-type: none"> Scale of local and strategic highway mitigation and implications for: <ul style="list-style-type: none"> Timing of provision Delivery of development Viability 	The site has been modelled within the Traffic Forecasting Study (EB61) and mitigation measures identified. Ahead of the EIP, the Council is updating its transport evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> Lack of an up to date Infrastructure Funding Statement (IFS) to accompany the latest Infrastructure Development Plan (IDP) June 2021. 	The Council is updating its Infrastructure Delivery Plan (EB69). This will be published in due course.
	<ul style="list-style-type: none"> Lack of a delivery programme for the provision of supporting infrastructure, services and facilities. 	The Council is updating its Infrastructure Delivery Plan (EB69). This will be published in due course.
	<ul style="list-style-type: none"> Concerns over timely delivery of all supporting infrastructure at early stages of the new settlement. 	The Council is updating its Infrastructure Delivery Plan (EB69). This will be published in due course.
	<ul style="list-style-type: none"> Existing and increased future flood risk from tidal/ fluvial flooding from the River Severn and fluvial flooding from the River Avon. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage. The Environment Agency has no objections.
	<ul style="list-style-type: none"> Details, funding or timescales for improvements to flood defences for the lifetime of the development are not included in the IDP. 	The Council is updating its Infrastructure Delivery Plan (EB69). This will be published in due course.
	<ul style="list-style-type: none"> Contrary to Gloucestershire strategic employment growth focus within the M5 Growth Zone, attractive to businesses and benefitting from excellent connectivity. 	Development of GREEN and complementary employment and education provision at Berkeley is a key part of GFirstLEP's Local Industrial Strategy.



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<ul style="list-style-type: none"> Highlight Employment Land Review (ELR) concerns regarding the delivery of employment development as a Knowledge Based Business Park. 	New settlements provide opportunities to develop new markets. In addition, employment provision at Sharpness would complement the Gloucestershire Science and Technology Park at Berkeley and Sharpness Docks and Severnside Distribution Park, which are important employment locations for the District.
	<ul style="list-style-type: none"> Better located alternative new settlement proposal at WHI014 Land at Grove End Farm, Whitminster. 	Sites at Moreton Valance and Whitminster were assessed at the Alternative Option stage in 2020 and do not perform better than this site at meeting the Plan's objectives in a sustainable way.
Policy wording modifications: None		
Grass Roots Planning for Clifton Homes (SW) Ltd (887)	<ul style="list-style-type: none"> Unsustainable location remote from employment centres, key facilities and sustainable transport corridors. 	Topic Paper: The Development Strategy October 2021 (EB4) and Topic Paper: Assessment and selection of sites (EB9) set out the Council's approach to identifying and assessing potential spatial strategy options and site options and how the development strategy was selected to meet requirements. The site will be an exemplar development in achieving net carbon zero development, fits within the preferred hybrid strategy approach, meets the strategy objective of regenerating the Berkeley/Sharpness area, is well located adjacent to services and facilities at tier 2 and tier 3a settlements, is adjacent to a good local road network with the A38 only 5-7 mins drive away and located adjacent to employment areas in Berkeley and Sharpness with opportunities to grow the GREEN focus in accordance with GFirstLEP's Local Industrial Strategy.
	<ul style="list-style-type: none"> 'Mobility as a Service' (MaaS) proposals do not comply with Garden City principles for public transport provision. <ul style="list-style-type: none"> No current partnership with a MaaS operator or commitment to deliver MaaS from sustainable transport providers or site promoters. 	The Council's Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> Significant doubts over viability and deliverability of proposed Zeelo bus service and the proposed rail link to reduce commuting. <ul style="list-style-type: none"> Not supported by strategic public transport stakeholders. 	The Council's Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> No proposed public transport improvements to local 	The Council's Sustainable Transport Strategy (EB60a-c) and the evidence



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	bus services for those travelling to smaller destinations.	from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> Likely increase in commuting with associated air quality and CO2 emission impacts contrary to climate emergency. 	The scale of development will create a level of self-containment and reduce the need to travel. The site will bring forward extensive biodiversity net gain and sustainable construction methods to achieve net carbon zero development.
	<ul style="list-style-type: none"> Significant concerns regarding Viability Assessment and ability to deliver initial strategic infrastructure, mitigation and 30% affordable housing. 	The Council’s Infrastructure Delivery Plan (EB69) and Council’s Viability Assessment (May 2021) (EB70), together with statements from the promoters (932 and EB95) demonstrate that the site is deliverable.
	<ul style="list-style-type: none"> Loss of Grade 3 agricultural land. 	This has been factored into the Sustainability Appraisal (CD3). Much of the site area will be subject to green infrastructure and habitat improvement.
	<ul style="list-style-type: none"> Alternative more sustainable locations at Whitminster, for strategic-scale development, and Cam, non-strategic development, with potential to boost housing supply in the shorter term. 	Alternative sites at Cam and Whitminster have been assessed through the Sustainability Appraisal (CD3) and do not perform better than this site at meeting the Plan’s objectives in a sustainable way.
	<ul style="list-style-type: none"> Impact on Severn Estuary SPA/ SAC Ramsar site and SSSI: <ul style="list-style-type: none"> Further work required to ensure compliance with HRA legislation. Potential delays to delivery and additional infrastructure costs. 	The development will mitigate any impacts on the Severn Estuary and is supported by Natural England. The new green infrastructure and nature reserve will offer positive benefits to local wildlife and people. The site does not fail to meet HRA legal duties.
Policy wording modifications: None		
Savills for L&Q Estates (913)	<ul style="list-style-type: none"> Unsustainable location for strategic residential development: <ul style="list-style-type: none"> Reliance on car. Uncertainty regarding scale and deliverability of employment and public transport provision. 	Topic Paper: The Development Strategy October 2021 (EB4) and Topic Paper: Assessment and selection of sites (EB9) set out the Council’s approach to identifying and assessing potential spatial strategy options and site options and how the development strategy was selected to meet requirements. The site will contain a range of services and facilities to create a level of self-containment, reducing the need to travel. The site fits within the preferred hybrid strategy approach, meets the strategy objective of regenerating the Berkeley/Sharpness area, is well located adjacent to services and facilities at tier 2 and tier 3a settlements, offers the opportunity to reuse the Sharpness branchline for passenger services, is adjacent to a good local road network with the A38 only 5-7 mins drive away and located



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
		adjacent to employment areas in Berkeley and Sharpness with opportunities to grow the GREEN focus in accordance with GFirstLEP’s Local Industrial Strategy.
	<ul style="list-style-type: none"> • Employment provision: <ul style="list-style-type: none"> ○ ELR concerns regarding deliverability of the Knowledge Park. ○ Scale of likely employment delivery, particularly at early stages of the plan period. ○ SA 16 Employment and SA17 Economic growth – major positive scoring unjustified. ○ Remote from employment centres 	New settlements provide opportunities to develop new markets. In addition, employment provision at Sharpness would complement the Gloucestershire Science and Technology Park at Berkeley and Sharpness Docks and Severnside Distribution Park, which are important employment locations for the District. Development would align with the GREEN focus for Berkeley in accordance with GFirstLEP’s Local Industrial Strategy. The GFirstLEP has invested millions of pounds in the Berkeley GREEN project and Science and Technology Park and economic regeneration of the area is fully supported by GFirstLEP, Canals & Rivers Trust, Western Gateway, GCC and other organisations – see the STEP Severn Gateway proposal, for example.
	<ul style="list-style-type: none"> • Public transport provision: <ul style="list-style-type: none"> ○ Distance from key employment locations greater than published Department of Transport average distance travelled by bus for commuting purposes. ○ Viability of bus provision in early stages and long term viability concerns over cost of continued high frequency provision. ○ Uncertainty of proposed rail link unsupported by strategic public transport stakeholders. ○ SA assessment reliant on deliverability of the rail link. ○ Limited potential to deliver modal shift. 	The Council’s Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> • Viability evidence: <ul style="list-style-type: none"> ○ Question Viability Assessment assumptions regarding gross and net developable area. ○ Supporting infrastructure requirements significantly underestimated. ○ Additional exceptional infrastructure costs not included in viability modelling. 	The Council’s Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course. Additional statements from the promoters (932 and EB95) demonstrate that the site is deliverable.



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<ul style="list-style-type: none"> ○ Expected market value uplift and reduced site construction costs not evidenced or justified. 	
	<ul style="list-style-type: none"> ● Impact on Severn Estuary SPA/ SAC Ramsar site and SSSI: <ul style="list-style-type: none"> ○ Cost of mitigation requirements and impact on viability. ○ Delayed housing delivery from required mitigation prior to occupation. ○ HRA uncertainty regarding impact on the integrity of the site. 	<p>The development will mitigate any impacts on the Severn Estuary and is supported by Natural England. The new green infrastructure and nature reserve will offer positive benefits to local wildlife and people. The Council's Infrastructure Delivery Plan (EB69) and Council's Viability Assessment (May 2021) (EB70), together with statements from the promoters (932 and EB95) demonstrate that the site is deliverable.</p>
	<ul style="list-style-type: none"> ● Flood risk: <ul style="list-style-type: none"> ○ Insufficient evidence to demonstrate the development is safe for its lifetime. ○ Need to demonstrate that the site has passed the Sequential and Exception Tests. ○ Likely increased tidal and fluvial flood risk. ○ Need for development to consider flood defence improvements not reflected in the IDP or Viability Assessment. 	<p>All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage. The site promoters have provided additional evidence (932 and EB95). The Environment Agency has no objections.</p>
	<ul style="list-style-type: none"> ● Alternative available site, suitable for strategic development G2 Land at Whaddon: <ul style="list-style-type: none"> ○ Would not harm integrity of SPA. ○ Represents a sequentially preferable site in terms of flood risk. 	<p>G2 Land at Whaddon is safeguarded to meet the needs of Gloucester City and has no functional links to established Stroud settlements.</p>
Policy wording modifications: None		
Lichfields for Charfield Landowners Consortium (923)	<ul style="list-style-type: none"> ● It is essential that a full assessment of the allocation and its impact on Junction 14 is carried out. 	<p>The site has been modelled within the Traffic Forecasting Study (EB61) and mitigation measures identified including for M5 J14. Ahead of the EIP, the Council is updating its transport evidence base and documentation. This will be published in due course.</p>
	<ul style="list-style-type: none"> ● The impact of strategic growth on M5 J14 must be tested taking into account cumulative growth in neighbouring local authority areas (e.g. Charfield) 	<p>Highway mitigation in the form of a new junction at Junction 14 has been tested as part of the transport model. The Council has committed to producing a Funding and Delivery Strategy for transport improvements in</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	with appropriate contributions secured for a strategic highways solution and included as an integral requirement of the draft policy.	partnership with National Highways, South Gloucestershire Council and Gloucestershire County Council. This will be published in due course.
	<ul style="list-style-type: none"> The policy is not supported by sufficient evidence of effective joint working on infrastructure and cross-boundary strategic matters with South Gloucestershire. 	The Council has been engaged with effective cross-boundary working on strategic matters with South Gloucestershire Council and this work continues. The most recent Statement of Common Ground and a summary of engagement by issue is set out in the Duty to Cooperate Statement (EB3).
Policy wording modifications:		
	<ul style="list-style-type: none"> Policy PS36 must reference the significant infrastructure issues at M5 Junction 14 and the mitigation required to ensure growth in Stroud is sustainable and deliverable. This needs to be added as a key bullet within the policy wording to make the point explicit as it is such a significant issue and key to the site's deliverability. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
	<ul style="list-style-type: none"> The plan should make it clear that no development should come forward until infrastructure has been designed, costed and agreed with Highways England, South Gloucestershire Council and other members of the Junction 14 Working Group and the works implemented. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Grass Roots Planning for Redrow Homes (SW) Ltd (949)	<ul style="list-style-type: none"> Unsustainable location remote from employment centres, key facilities and sustainable transport corridors. 	Topic Paper: The Development Strategy October 2021 (EB4) and Topic Paper: Assessment and selection of sites (EB9) set out the Council's approach to identifying and assessing potential spatial strategy options and site options and how the development strategy was selected to meet requirements. The site will be an exemplar development in achieving net carbon zero development, fits within the preferred hybrid strategy approach, meets the strategy objective of regenerating the Berkeley/Sharpness area, is well located adjacent to services and facilities at tier 2 and tier 3a settlements, is adjacent to a good local road network with the A38 only 5-7 mins drive away and located adjacent to employment areas in Berkeley and Sharpness with opportunities to grow the GREEN focus in accordance with GFirstLEP's Local Industrial Strategy.



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<ul style="list-style-type: none"> • ‘Mobility as a Service’ (MaaS) proposals do not comply with Garden City principles for public transport provision. <ul style="list-style-type: none"> ○ No current partnership with a MaaS operator or commitment to deliver MaaS from sustainable transport providers or site promoters. 	The Council’s Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> • Significant doubts over viability and deliverability of proposed Zeelo bus service and the proposed rail link to reduce commuting. <ul style="list-style-type: none"> ○ Not supported by strategic public transport stakeholders. 	The Council’s Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> • No proposed public transport improvements to local bus services for those travelling to smaller destinations. 	The Council’s Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> • Likely increase in commuting with associated air quality and CO2 emission impacts contrary to climate emergency. 	The scale of development will create a level of self-containment and reduce the need to travel. The site will bring forward extensive biodiversity net gain and sustainable construction methods to achieve net carbon zero development.
	<ul style="list-style-type: none"> • Significant concerns regarding Viability Assessment and ability to deliver initial strategic infrastructure, mitigation and 30% affordable housing. 	The Council’s Infrastructure Delivery Plan (EB69) and Council’s Viability Assessment (May 2021) (EB70), together with statements from the promoters (932 and EB95) demonstrate that the site is deliverable.
	<ul style="list-style-type: none"> • Loss of Grade 3 agricultural land. 	This has been factored into the Sustainability Appraisal (CD3). Much of the site area will be subject to green infrastructure and habitat improvement.
	<ul style="list-style-type: none"> • Alternative more sustainable locations at Whitminster, for strategic-scale development, and Kingswood, for non-strategic development, with potential to boost housing supply in the shorter term. 	Alternative sites at Cam and Whitminster have been assessed through the Sustainability Appraisal (CD3) and do not perform better than this site at meeting the Plan’s objectives in a sustainable way.
	<ul style="list-style-type: none"> • Impact on Severn Estuary SPA/ SAC Ramsar site and SSSI: <ul style="list-style-type: none"> ○ Further work required to ensure compliance with HRA legislation. ○ Potential delays to delivery and additional infrastructure costs. 	The development will mitigate any impacts on the Severn Estuary and is supported by Natural England. The new green infrastructure and nature reserve will offer positive benefits to local wildlife and people. The site does not fail to meet HRA legal duties.



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
Policy wording modifications: None		
Grass Roots Planning for Redrow Homes (SW) Ltd (951)	<ul style="list-style-type: none"> Unsustainable location remote from employment centres, key facilities and sustainable transport corridors. 	<p>Topic Paper: The Development Strategy October 2021 (EB4) and Topic Paper: Assessment and selection of sites (EB9) set out the Council’s approach to identifying and assessing potential spatial strategy options and site options and how the development strategy was selected to meet requirements. The site will be an exemplar development in achieving net carbon zero development, fits within the preferred hybrid strategy approach, meets the strategy objective of regenerating the Berkeley/Sharpness area, is well located adjacent to services and facilities at tier 2 and tier 3a settlements, is adjacent to a good local road network with the A38 only 5-7 mins drive away and located adjacent to employment areas in Berkeley and Sharpness with opportunities to grow the GREEN focus in accordance with GFirstLEP’s Local Industrial Strategy.</p>
	<ul style="list-style-type: none"> ‘Mobility as a Service’ (MaaS) proposals do not comply with Garden City principles for public transport provision. <ul style="list-style-type: none"> No current partnership with a MaaS operator or commitment to deliver MaaS from sustainable transport providers or site promoters. 	<p>The Council’s Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.</p>
	<ul style="list-style-type: none"> Significant doubts over viability and deliverability of proposed Zeelo bus service and the proposed rail link to reduce commuting. <ul style="list-style-type: none"> Not supported by strategic public transport stakeholders. 	<p>The Council’s Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.</p>
	<ul style="list-style-type: none"> No proposed public transport improvements to local bus services for those travelling to smaller destinations. 	<p>The Council’s Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.</p>
	<ul style="list-style-type: none"> Likely increase in commuting with associated air quality and CO2 emission impacts contrary to climate emergency. 	<p>The scale of development will create a level of self-containment and reduce the need to travel. The site will bring forward extensive biodiversity net gain and sustainable construction methods to achieve net carbon zero development.</p>
	<ul style="list-style-type: none"> Significant concerns regarding Viability Assessment 	<p>The Council’s Infrastructure Delivery Plan (EB69) and Council’s Viability</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	and ability to deliver initial strategic infrastructure, mitigation and 30% affordable housing.	Assessment (May 2021) (EB70), together with statements from the promoters (932 and EB95) demonstrate that the site is deliverable.
	<ul style="list-style-type: none"> Loss of Grade 3 agricultural land. 	This has been factored into the Sustainability Appraisal (CD3). Much of the site area will be subject to green infrastructure and habitat improvement.
	<ul style="list-style-type: none"> Alternative more sustainable locations at Whitminster, for strategic-scale development, and Kingswood, for non-strategic development, with potential to boost housing supply in the shorter term. 	Alternative sites at Whitminster and Kingswood have been assessed through the Sustainability Appraisal (CD3) and do not perform better than this site at meeting the Plan’s objectives in a sustainable way.
	<ul style="list-style-type: none"> Impact on Severn Estuary SPA/ SAC Ramsar site and SSSI: <ul style="list-style-type: none"> Further work required to ensure compliance with HRA legislation. Potential delays to delivery and additional infrastructure costs. 	The development will mitigate any impacts on the Severn Estuary and is supported by Natural England. The new green infrastructure and nature reserve will offer positive benefits to local wildlife and people. The site does not fail to meet HRA legal duties.
	Policy wording modifications: None	
Stagecoach West (952)	<ul style="list-style-type: none"> Unsustainable location contrary to development strategy and carbon neutral commitment. 	The site will be an exemplar development in achieving net carbon zero development, fits within the preferred hybrid strategy approach, meets the strategy objective of regenerating the Berkeley/Sharpness area, is well located adjacent to services and facilities at tier 2 and tier 3a settlements, is adjacent to a good local road network with the A38 only 5-7 mins drive away and located adjacent to employment areas in Berkeley and Sharpness with opportunities to grow the GREEN focus in accordance with GFirstLEP’s Local Industrial Strategy.
	<ul style="list-style-type: none"> Impossible to achieve any synergy with or benefit to existing or deliverable public transport services. 	Existing bus services between Berkeley and Cam could be enhanced through the development of Sharpness new settlement.
	<ul style="list-style-type: none"> “Bespoke” transport infrastructure and services undermined by achievable frequency, extended journey time relative to car use and the limited range of destinations. 	The Council’s Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> Deliverability and sustained longer term provision of proposed services challengeable due to cost. <ul style="list-style-type: none"> Only commuter coach element costed. 	The Council’s Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> Restoration of passenger rail services on the 	The Council’s Sustainable Transport Strategy (EB60a-c) and the evidence



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<p>Sharpness Branch Line unjustified:</p> <ul style="list-style-type: none"> ○ Lack of evidenced business case and opportunity costs. ○ Not supported by key rail stakeholders. 	from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> ● Few travel choice alternatives to car use combined with limited self-containment at early stages of delivery. 	The scale and type of development (e.g. secondary school and employment) will create a level of self-containment and reduce the need to travel. Proximity to services and facilities at Berkeley (a tier 2 settlement) provides local facilities during the early stages of delivery.
	<ul style="list-style-type: none"> ● Attractive and effective local bus service provision undeliverable in this location. 	Existing bus services between Berkeley and Cam could be enhanced through the development of Sharpness new settlement.
Policy wording modifications: None		
Comment		
The Wildfowl & Wetlands Trust (WWT) (68)	<ul style="list-style-type: none"> ● Superseded version of the HRA initially published on the consultation landing page. 	The Council has published documents as they become available during the SDLP process.
	<ul style="list-style-type: none"> ● Potential impacts from development and associated pressures on the Severn Estuary SPA/SAC/Ramsar site. <ul style="list-style-type: none"> ○ adverse impact on interest features of designated sites not ruled out at this stage. 	The evidence base and policy wording has been prepared to ensure development will mitigate any impacts on the Severn Estuary. Proposals are supported by Natural England.
	<ul style="list-style-type: none"> ● Further work required, in accordance with HRA and Natural England (NE), to ensure the requirements of the Conservation of Habitats and Species Regulations (2017) are fully met. 	Comment noted
	<ul style="list-style-type: none"> ● Potential benefits for local biodiversity from wetland features and proposed nature reserve. 	Comment noted
	<ul style="list-style-type: none"> ● The updated HRA provides scant specific details of the necessary mitigation measures that will be adopted to ensure no adverse impact on the Severn Estuary SPA/SAC/Ramsar site. <ul style="list-style-type: none"> ○ Proposed mitigation measures should be confirmed, e.g. in an updated Severn Estuary Recreation & Mitigation Strategy. 	Currently Stroud District Council, working with other Gloucestershire LPAs and Natural England is reviewing Severn Estuary visitor pressures, with the intention to jointly produce a visitor survey and a future mitigation strategy.
	<ul style="list-style-type: none"> ● The assessment of alternative allocations that would 	Comment noted



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement			
	<p>avoid significant effects is a key step in the Habitats Regulations process.</p> <ul style="list-style-type: none"> ○ Need to demonstrate that alternative proposals that avoid creating significant effects have been assessed and dismissed . 		
	<ul style="list-style-type: none"> ● Further detailed HRA activity will need to be submitted with any detailed planning proposals. 	Comment noted	
Policy wording modifications: None			
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> ● Welcome recognition of the risk for a significant adverse impact on the Severn Estuary SAC/SPA/Ramsar and measures taken to avoid this. 	The evidence base and policy wording has been prepared to ensure development will mitigate any impacts on the Severn Estuary. Proposals are supported by Natural England.	
	<ul style="list-style-type: none"> ● Support provision of 8ha of SANG and 35 ha of new nature reserve subject to review based on existing and potential users to ensure measures are sufficient. 	Support noted	
	<ul style="list-style-type: none"> ● Non-designated land within or near to the allocation area that has importance to the cited features of the SPA should be protected from direct or indirect adverse impacts. 	Comment noted	
	<ul style="list-style-type: none"> ● Phase 1 strategic GI provision well located for ecological benefit. 	Support noted.	
	<ul style="list-style-type: none"> ● Highlight potential concerns regarding Phase 2: <ul style="list-style-type: none"> ○ Includes Wanswell Hay Meadows and Tintock Wood Local Wildlife Sites. ○ A large proportion of the allocation land is in a high priority zone for enhancement in the Nature Recovery Network and includes small fragments of the core network. 	Comment noted	
	<ul style="list-style-type: none"> ● An EIA should be undertaken of cumulative impacts and recreation pressure on internationally, nationally and locally designated sites. 	A planning application will require a comprehensive EIA to address the matters set out in the representation.	
	Policy wording modifications:		
	<ul style="list-style-type: none"> ● Biodiversity Net Gain requirements should be set at a minimum of 20% aligned with the Nature Recovery 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.	



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<p>Network, to demonstrate the credentials of a 'garden community' status delivering above the minimum environmental standards.</p> <ul style="list-style-type: none"> Development should meet Building With Nature design and build standards. 	
		Policy PS36 includes a requirement for Sharpness new settlement to create "A network of multifunctional Green Infrastructure throughout the development in accordance with Building with Nature standards." (criteria 4)
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> Uncertainty over provision of rail link and deliverability of Garden Village as proposed. 	The Council's Infrastructure Delivery Plan (EB69) and Council's Viability Assessment (May 2021) (EB70), together with statements from the promoters (932 and EB95) demonstrate that the site is deliverable. The site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> Delivery of 2,400 houses within the plan period is unrealistic: <ul style="list-style-type: none"> Anticipated delivery of 5000 dwellings by 2030 unlikely due to lead-in times. Potential additional delays due to infrastructure requirements and land sale process. Unrealistic annual build out rate. 	Statements from the promoters (932 and EB95) demonstrate that the site is deliverable with the potential to exceed the delivery rates identified by the Council in the SDLP given the potential for multiple sales outlets and the strength of the market.
	<ul style="list-style-type: none"> Lack of a detailed trajectory for delivery. 	The summary trajectory in the SDLP is supported by more detailed site specific trajectories. Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> Shortfall in planned short term housing land supply. 	There is no shortfall in planned short term housing land supply in the District.
	Policy wording modifications: None	
CPRE Gloucestershire (847)	<ul style="list-style-type: none"> Potential impacts from development and associated pressures on the Severn Estuary SPA/SAC/Ramsar site. <ul style="list-style-type: none"> Further work required, in accordance with HRA and confirmation from NE to ensure the requirements of the Conservation of Habitats and Species Regulations (2017) are fully met. 	The evidence base and policy wording has been prepared to ensure development will mitigate any impacts on the Severn Estuary. Proposals are supported by Natural England.
	<ul style="list-style-type: none"> Proximity to ammonium nitrate storage facility at 	The current HSE consultation distance for ammonium nitrate at Sharpness



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	Sharpness Docks and HSE review of consultation zone following Beirut disaster.	Docks does not impact materially upon the allocation.
	<ul style="list-style-type: none"> • ‘Garden Community’ unrealistic: <ul style="list-style-type: none"> ○ Concerns regarding long term leasehold/ maintenance charges and impacts. ○ Management of green spaces within the development. ○ Requires high quality design and materials sympathetic to the district. 	A range of tools including a community engagement and stewardship strategy, design codes and a spatial masterplan and implementation plan, to be approved by the District Council, will detail the way in which the new community, land uses and infrastructure will be developed in an integrated and coordinated manner.
	<ul style="list-style-type: none"> • Loss of good, productive agricultural land. 	This has been factored into the Sustainability Appraisal (CD3). Much of the site area will be subject to green infrastructure and habitat improvement.
	<ul style="list-style-type: none"> • Delivery of rail and bus services: <ul style="list-style-type: none"> ○ Uncertainty over proposed rail link. ○ Dependent on significant investment and commitment from public transport providers. ○ Requires improvement to infrastructure and frequency of service at Cam and Dursley Station. 	The Council’s Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> • Local and strategic highway network, including A4066, A38 and M5 Junctions 13 and 14, inadequate to cope with additional traffic. 	The site has been modelled within the Traffic Forecasting Study (EB61) and mitigation measures identified. Ahead of the EIP, the Council is updating its transport evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> • Unattractive location for commercial development. 	The site is adjacent to the Gloucestershire Science and Technology Park at Berkeley and Sharpness Docks and Severnside Distribution Park, which are important employment locations for the District and the site will deliver an additional 10 hectares of employment growth. The GFirstLEP has invested millions of pounds in the Berkeley GREEN project and Science and Technology Park and economic regeneration of the area is fully supported by GFirstLEP, Canals & Rivers Trust, Western Gateway, GCC and other organisations – see the STEP Severn Gateway proposal, for example.
	<ul style="list-style-type: none"> • Provision of schools, medical services, shops, recreation facilities and links to existing local facilities must be constructed at the beginning of the 	Comment noted, although the site is also adjacent to a tier 2 settlement – Berkeley – which will provide complementary local services and facilities during the initial construction phase.



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	development to establish a neighbourhood community.	
	<ul style="list-style-type: none"> Adverse impact on commercial centre of Berkeley. 	The commercial centre is likely to benefit from the increased catchment area, particularly during the initial construction phase. There is no evidence that Sharpness new settlement will be detrimental to Berkeley's health.
	<ul style="list-style-type: none"> Increased flood risk and impacts for flood dispersal, waste water and sewage infrastructure to avoid pollution. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage. The site promoters have provided additional evidence (932 and EB95). The Environment Agency has no objections.
	<ul style="list-style-type: none"> Alternative site to meet Stroud's housing needs at G2 Land at Whaddon. 	G2 Land at Whaddon is safeguarded to meet the needs of Gloucester City and has no functional links to established Stroud settlements.
	Policy wording modifications: None	
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> Uncertainty over provision of rail link and deliverability of Garden Village as proposed. 	The Council's Infrastructure Delivery Plan (EB69) and Council's Viability Assessment (May 2021) (EB70), together with statements from the promoters (932 and EB95) demonstrate that the site is deliverable. The site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> Delivery of 2,400 houses within the plan period is unrealistic: <ul style="list-style-type: none"> Anticipated delivery of 500 dwellings by 2030 unlikely due to lead-in times. Potential additional delays due to infrastructure requirements and land sale process. Unrealistic annual build out rate. 	Statements from the promoters (932 and EB95) demonstrate that the site is deliverable with the potential to exceed the delivery rates identified by the Council in the SDLP given the potential for multiple sales outlets and the strength of the market.
	<ul style="list-style-type: none"> Lack of a detailed trajectory for delivery. 	The summary trajectory in the SDLP is supported by more detailed site specific trajectories. Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> Shortfall in planned short term housing land supply. 	There is no shortfall in planned short term housing land supply in the District.
	Policy wording modifications: None	
Alkington Parish Council (852)	<ul style="list-style-type: none"> Scale of development contrary to public consultation support for dispersed development. 	The results of public consultation at the issues and options stage clearly favoured a development strategy based on concentrated growth rather than dispersal. Only when the location of the sites were known at the Emerging



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
		Strategy stage, did public support for dispersal alternatives grow. It is not feasible to disperse the level of development in the way envisaged by people opposed to the strategic allocations.
	<ul style="list-style-type: none"> Strategic and local highway network, including A38 and M5 Junctions 13 and 14 inadequate to cope with increased private and commercial traffic. 	The site has been modelled within the Traffic Forecasting Study (EB61) and mitigation measures identified. Ahead of the EIP, the Council is updating its transport evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> More suitable alternative strategic development site at Moreton Valence: <ul style="list-style-type: none"> Close to Gloucester Supports Gloucester 2050 vision Existing good infrastructure 	The site at Moreton Valence was assessed at the Alternative Option stage in 2020 and did not perform better than this site at meeting the Plan's objectives in a sustainable way.
	<ul style="list-style-type: none"> Local employment assumptions are unrealistic. 	The site is adjacent to the Gloucestershire Science and Technology Park at Berkeley and Sharpness Docks and Severnside Distribution Park, which are important employment locations for the District and the site will deliver an additional 10 hectares of employment growth. The GFirstLEP has invested millions of pounds in the Berkeley GREEN project and Science and Technology Park and economic regeneration of the area is fully supported by GFirstLEP, Canals & Rivers Trust, Western Gateway, GCC and other organisations – see the STEP Severn Gateway proposal, for example.
	<ul style="list-style-type: none"> Environmental impact of increased commuting for jobs and education. 	The scale of development, including employment provision and new secondary school, will create a level of self-containment and reduce the need to travel.
	<ul style="list-style-type: none"> Proposed rail link is unrealistic. 	The evidence from the site promoters (932 and EB95) demonstrates that the site has credible proposals for reopening the existing railway branchline to passenger services.
	Policy wording modifications: None	
Vale of Berkeley Railway Trust (VoBRT) (870)	<ul style="list-style-type: none"> Oppose proposed rail station location. 	The site promoters are discussing options for the rail service in partnership with the Vale of Berkeley Railway Trust.
	<ul style="list-style-type: none"> No recognition of the VoBRT's existing work to develop and rebuild Berkeley station as a local community resource and heritage centre. 	The District Council supports the work of the Vale of Berkeley Railway Trust and welcomes suggestions on how the SDLP can better reflect the work of the Trust.
	<ul style="list-style-type: none"> No recognition of the VoBRT's ambition to run tourist 	The District Council supports the work of the Vale of Berkeley Railway Trust



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<p>passenger services between stations at Sharpness and Berkeley within the next 5 years and beyond Berkeley towards Berkeley Road within the lifetime of the plan, included in the 'Restoring Your Railway' submission to DfT, endorsed by Stroud DC.</p>	and welcomes suggestions on how the SDLP can better reflect the work of the Trust.
	<ul style="list-style-type: none"> No recognition of the VoBRT's contribution and benefits to local tourism. 	The District Council supports the work of the Vale of Berkeley Railway Trust and welcomes suggestions on how the SDLP can better reflect the work of the Trust.
	<ul style="list-style-type: none"> No formal consultation with VoBRT regarding the potential for the provision of public rail transport. 	The site promoters are discussing options for the rail service in partnership with the Vale of Berkeley Railway Trust. The District Council supports these discussions continuing.
Policy wording modifications:		
	<ul style="list-style-type: none"> Removal of the graphic on p 180 showing the location of a new station at Sharpness. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
	<ul style="list-style-type: none"> Suggested wording: "The final location of a station at Sharpness shall be decided following consultation between housing developers, the Vale of Berkeley Railway Trust and other local stakeholders". 	
Avison Young for Nuclear Decommissioning Authority (NDA and Magnox Ltd (872)	<ul style="list-style-type: none"> Additional pressure on highway network, during construction and on completion, and impacts on emergency access provision and movement of large plant/ materials from the Berkeley site. 	Further conversations are welcomed to ensure that the delivery of the new settlement will not impact adversely on the Berkeley site.
	<ul style="list-style-type: none"> Lack of consideration for the consented decommissioning activities on the Berkeley site in line with the 'Agent of Change' principle. 	
	<ul style="list-style-type: none"> Impact of remediation works on proposed residential development requiring potential mitigation. 	
	Policy wording modifications: None	
Savills (UK) Limited for The Berkeley Estate (TBE) (878)	<ul style="list-style-type: none"> Potential impacts of B4066 corridor improvements on the Grade I Listed Berkeley Castle and the Grade II* listed Registered Park and Garden. 	The site has been modelled within the Traffic Forecasting Study (EB61) and mitigation measures identified. Ahead of the EIP, the Council is updating its transport evidence base and documentation. This will be published in due course. The Council does not wish, nor expect, any necessary corridor



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
		improvements to impact on the Castle and gardens.
	<ul style="list-style-type: none"> Policy wording difficult to quantify and define: <ul style="list-style-type: none"> “adequate and timely infrastructure”; “bespoke and innovative layout” 	Comment noted
	<ul style="list-style-type: none"> TBE land identified in Phase 2, adjoining Focus School, Wanswell, more appropriate for inclusion as part of PS35 allocation. 	Comment noted
Policy wording modifications: None		
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> Uncertainty over provision of rail link and deliverability of Garden Village as proposed. 	The Council’s Infrastructure Delivery Plan (EB69) and Council’s Viability Assessment (May 2021) (EB70), together with statements from the promoters (932 and EB95) demonstrate that the site is deliverable. The site has credible public transport options to supplement existing services.
	<ul style="list-style-type: none"> Delivery of 2,400 houses within the plan period is unrealistic: <ul style="list-style-type: none"> Anticipated delivery of 500 dwellings by 2030 unlikely due to lead-in times. Potential additional delays due to infrastructure requirements and land sale process. Unrealistic annual build out rate. 	Statements from the promoters (932 and EB95) demonstrate that the site is deliverable with the potential to exceed the delivery rates identified by the Council in the SDLP given the potential for multiple sales outlets and the strength of the market.
	<ul style="list-style-type: none"> Lack of a detailed trajectory for delivery. 	The summary trajectory in the SDLP is supported by more detailed site specific trajectories. Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> Shortfall in planned short term housing land supply. 	There is no shortfall in planned short term housing land supply in the District.
	Policy wording modifications: None	
Gloucestershire County Council (GCC) (904)	<ul style="list-style-type: none"> Rail proposals unlikely to be deliverable as set out in SLC Rail viability study June 2021: <ul style="list-style-type: none"> Likely loss making service with weak economic case and low Benefit Cost Ratio (BCR). No wider strategic purpose. Potential impact on Local Transport Plan (LTP) 	<p>The evidence from the site promoters (932 and EB95) demonstrates that the site has credible proposals for reopening the existing railway branchline to passenger services.</p> <p>The PVB and PVC generate a healthy Benefit Cost Ratio (BCR) of 5.03 before adjusting for deadweight and displacement, and 3.22 afterwards.</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<p>priority for enhanced Bristol – Birmingham service delivering wider economic benefit and connectivity.</p> <ul style="list-style-type: none"> ○ No commitment from strategic rail infrastructure providers. ○ Potential conflict and performance risk to existing rail services. 	<p>Detailed timetable modelling demonstrates that the planned service can be accommodated on the railway network – both now, and when considered in the context of other planned service changes.</p> <p>The site promoters are discussing options for the rail service in partnership with the Vale of Berkeley Railway Trust. The District Council supports these discussions continuing.</p>
	<ul style="list-style-type: none"> ● Zeelo express coach model unlikely to deliver modal shift: <ul style="list-style-type: none"> ○ Unrealistic journey times and assumptions. ○ Practicality and attractiveness of service to users. ○ Limited departure/ arrival times. ○ Not located on any strategic transport corridor. ○ Risk to long term viability from ambitions for self-containment and internalisation. ○ Not reflective of typical transport demand in Gloucestershire. 	<p>The Council’s Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services.</p>
	<ul style="list-style-type: none"> ● Unsustainable location: <ul style="list-style-type: none"> ○ Remote and significant distance from major transport corridors such as A38, M5 and mainline railway. ○ Will not benefit from the potential connectivity arising from GCC’s strategic ambition to utilise the major transport corridors for high frequency bus services, linking with major transport hubs and railway stations. ○ Dependent on high risk, high cost proposals with potential insufficient demand to make them deliverable or viable. ○ Less sustainable than other development locations. 	<p>Topic Paper: The Development Strategy October 2021 (EB4) and Topic Paper: Assessment and selection of sites (EB9) set out the Council’s approach to identifying and assessing potential spatial strategy options and site options and how the development strategy was selected to meet requirements. The site fits within the preferred hybrid strategy approach, meets the strategy objective of regenerating the Berkeley/Sharpness area, is well located adjacent to services and facilities at tier 2 and tier 3a settlements, is adjacent to a good local road network with the A38 only 5-7 mins drive away and located adjacent to employment areas in Berkeley and Sharpness with opportunities to grow the GREEN focus in accordance with GFirstLEP’s Local Industrial Strategy. The scale and type of development (e.g. secondary school and employment) will create a level of self-containment and reduce the need to travel. The site has credible public transport options to supplement existing services including reopening an existing operational railway line to passenger services.</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
		Having considered all of the relevant factors, Sharpness new settlement performs relatively well compared with reasonable alternatives.
	Policy wording modifications: None	
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
365	<ul style="list-style-type: none"> Support in principle subject to delivery of the rail link, funded by the development in agreement with relevant rail operators, to avoid compromising 2030 Carbon Neutral commitment. 	Comment noted
71, 72, 78, 79, 114, 123, 124, 130, 131, 137, 141, 144, 158, 159, 166, 191, 198, 205, 220, 222, 227, 228, 232, 248, 250, 253, 269, 272, 276, 281, 282, 283, 292, 294, 310, 321, 345, 350, 352, 363, 368, 369, 375, 381, 388, 391, 408, 409, 421, 426, 443, 445, 446, 448, 455, 461, 462, 469, 482, 495, 498, 516, 519, 523, 531, 544, 547, 554, 556, 567, 571, 573, 574, 593, 613, 617, 629, 636, 643, 646, 651, 656, 658, 680, 681, 691, 709, 712, 714,	<ul style="list-style-type: none"> Remote location will lead to increased commuting for work and leisure with associated emissions and impacts on air quality: <ul style="list-style-type: none"> Site rated as having no impact on air quality. Health implications from poor air quality. No opportunity to benefit from existing infrastructure and amenities. Emissions from construction traffic over 30 year period. 	<p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p> <p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>The site will also provide 10 hectares of B1, B2 and B8 employment land and ancillary employment uses, to reflect the identified sectoral needs of the District and local area. As well as local centre, incorporating employment, local retail, surgery and other community uses to meet the needs of the development.</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
721, 722, 723, 725, 728, 733, 748, 756, 759, 777, 783, 784, 785, 787, 789, 804		
71, 72, 78, 105, 110, 120, 124, 130, 136, 137, 142, 143, 145, 150, 157, 158, 159, 180, 195, 198, 199, 227, 233, 235, 243, 245, 248, 250, 253, 254, 256, 267, 270, 272, 279, 286, 287, 292, 303, 316, 346, 348, 349, 350, 352, 363, 364, 368, 369, 381, 408, 409, 421, 426, 430, 435, 443, 446, 448, 455, 461, 462, 482, 489, 494, 495, 506, 508, 509, 515, 523, 533, 536, 543, 547, 552, 553, 554, 556, 557, 567, 571, 572, 573, 574, 578, 580, 582, 586, 592, 593, 613, 636, 639, 643, 646, 656, 658, 678, 680, 691, 697, 699, 710, 712, 717, 721, 722, 723, 725, 728, 733, 745, 748, 751, 752, 755,	<ul style="list-style-type: none"> • Greenfield development: <ul style="list-style-type: none"> ○ Contrary to climate emergency agenda. ○ Loss of biodiversity. ○ Loss of natural flood mitigation and impact on flood risk. ○ Loss of farmland. ○ Loss of amenity space. ○ Loss of potential climate mitigation resource for renewable energy, carbon sinks, flood management, biodiversity mitigation. 	<p>Sites that are on greenfield land classed as high quality agricultural land (Grades 1, 2 or 3a) are rated red, as having a significant negative (--) effect, for efficiency in land use and protection of soil quality regardless of size. Sites are allocated having regard to Sustainability Appraisal across 17 SA objectives; this is a balanced judgement taking all objectives into consideration, SA Report Appendix 4 (CD3b).</p> <p>The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.</p> <p>The climate change agenda is not about stopping any future development, New Core Policy DCP1 Delivering Carbon Neutral by 2030 sets out the overarching requirements for all new development, to support the Council’s target to become Carbon Neutral by 2030</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
756, 759, 766, 774, 778, 782, 783, 784, 785, 789, 794, 795, 802, 804, 894		
Strategic growth and development locations		
788	<ul style="list-style-type: none"> Sustainable development. 	Comment noted
479	<ul style="list-style-type: none"> Lack of vision of long term future of work and travel. 	The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b). Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.
5, 7, 70, 71, 72, 73, 74, 79, 103, 110, 114, 120, 123, 128, 129, 130, 136, 140, 143, 146, 150, 151, 157, 158, 159, 162, 164, 166, 167, 172, 177, 178, 197, 199, 206, 207, 210, 213, 217, 220, 225, 227, 228, 232, 234, 235, 237, 238, 240, 250, 251, 252, 255, 256, 260, 261, 262, 265, 269, 270, 271, 279, 281, 282, 283, 285, 287, 288, 289, 290, 292, 295, 306, 307, 310, 311, 316, 320,	<ul style="list-style-type: none"> Scale of development disproportionate to rural character and local needs. 	<p>Topic Paper: The Development Strategy October 2021 (EB4) and Topic Paper: Assessment and selection of sites (EB9) set out the Council’s approach to identifying and assessing potential spatial strategy options and site options and how the development strategy was selected to meet requirements. The site fits within the preferred hybrid strategy approach, meets the strategy objective of regenerating the Berkeley/Sharpness area, is well located adjacent to services and facilities at adjacent tier 2 and tier 3a settlements.</p> <p>The Council considers PS36 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement	
321, 325, 326, 329, 336, 345, 346, 347, 349, 350, 352, 354, 355, 360, 363, 368, 369, 370, 371, 375, 378, 380, 381, 382, 389, 390, 413, 416, 430, 432, 433, 435, 443, 444, 446, 448, 449, 450, 452, 453, 459, 461, 462, 468, 469, 473, 479, 482, 489, 498, 506, 510, 512, 515, 516, 517, 519, 528, 530, 531, 533, 535, 543, 544, 547, 554, 557, 561, 562, 571, 573, 578, 580, 582, 586, 589, 613, 618, 628, 629, 636, 646, 653, 678, 691, 699, 704, 707, 708, 710, 720, 721, 722, 724, 725, 733, 739, 742, 745, 747, 748, 749, 751, 753, 755, 762, 764, 767, 769, 783, 785, 789, 794, 796, 797, 802	



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
71, 72, 110, 111, 130, 164, 199, 203, 220, 232, 256, 269, 278, 290, 292, 326, 339, 348, 349, 355, 363, 368, 369, 381, 388, 389, 408, 409, 412, 415, 443, 444, 445, 446, 448, 450, 461, 462, 468, 489, 494, 495, 509, 512, 516, 523, 535, 547, 554, 556, 557, 567, 573, 582, 629, 636, 691, 718, 720, 721, 730, 733, 748, 754, 760, 789, 790, 795, 894, 898	<ul style="list-style-type: none"> • Distribution of development: <ul style="list-style-type: none"> ○ Unfair concentration of development ○ Disproportionate level of development in the south of the District. ○ More sustainable alternative sites in the north of the District – Brookthorpe, Hardwicke, Moreton Valence, Whaddon, Whitminster. ○ Other more sustainable locations at Cam/ Dursley, Cambridge, Wisloe, Stonehouse/ Stroud, Gloucester Fringe, East of A38, with better transport links, brownfield opportunities, access to employment and services. 	<p>Topic Paper: The Development Strategy October 2021 (EB4) and Topic Paper: Assessment and selection of sites (EB9) set out the Council’s approach to identifying and assessing potential spatial strategy options and site options and how the development strategy was selected to meet requirements. The site fits within the preferred hybrid strategy approach, meets the strategy objective of regenerating the Berkeley/Sharpness area, is well located adjacent to services and facilities at tier 2 and tier 3a settlements.</p> <p>The Council considers PS36 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p>
71, 72, 78, 124, 198, 222, 363, 368, 426, 443, 445, 446, 448, 523, 547, 567, 573, 574, 656, 658, 680, 712, 717, 721, 748, 759, 764, 789	<ul style="list-style-type: none"> • Concerns over site selection and appraisal of site alternatives: <ul style="list-style-type: none"> ○ Lack of consistency and objectivity in the Sustainability Appraisal (SA) of sites. ○ SA identifies significant uncertainties in appraisal of PS36. ○ Initial site selection uninformed by an appropriate HRA assessment. ○ Comparison of developer aspirations against existing facilities on other sites. ○ Reputational impact on deliverability of proximity to nuclear waste dump and AN storage facility not adequately considered Vs alternative sites. 	<p>The Council considers PS36 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p>
101, 142, 143, 178,	<ul style="list-style-type: none"> • Inappropriate location due to Health and safety 	<p>The current HSE consultation distance for ammonium nitrate at Sharpness</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
232, 236, 243, 247, 276, 339, 348, 375, 388, 445, 523, 550, 567, 760, 780, 894	<p>implications:</p> <ul style="list-style-type: none"> ○ proximity to ammonium nitrate storage at Sharpness Docks. ○ Berkeley Decommissioning site. ○ Impact of light pollution on the safe navigation of shipping into Sharpness port. 	<p>Docks does not impact materially upon the allocation.</p> <p>There is no evidence that proximity to the Nuclear Decommissioning site at Berkeley will impact materially on emergency planning, residential amenity/ market attractiveness and associated viability matters for the delivery of infrastructure.</p> <p>There is no evidence that light pollution will impact safe navigation of shipping into Sharpness port.</p>
9, 72, 78, 114, 124, 130, 146, 158, 160, 198, 199, 205, 213, 232, 243, 244, 250, 251, 255, 269, 272, 281, 282, 283, 292, 308, 311, 334, 347, 348, 350, 363, 368, 381, 408, 426, 430, 432, 443, 444, 446, 448, 455, 468, 469, 473, 490, 495, 506, 512, 516, 523, 530, 533, 543, 547, 557, 561, 567, 572, 573, 574, 582, 586, 589, 593, 626, 629, 656, 658, 680, 691, 712, 717, 718, 721, 725, 730, 733, 748, 758, 759, 762, 764, 777, 789, 796, 802, 804	<ul style="list-style-type: none"> ● Concerns over Plan making process, including: <ul style="list-style-type: none"> ○ Contrary to public consultation representations at all stages of the Local Plan Review process. ○ Not supported by local communities. ○ Concerns over consultation process and engagement with local communities. ○ Lack of timely evidence. ○ Contrary to evidence base. ○ Concerns over reporting and consideration of representations received. ○ Inadequate discussion of Pre-submission Plan at Full Council. ○ Premature decision making prior to impacts of covid and the pandemic on work/ lifestyle. 	<p>The Statement of Community Involvement March 2020 (EB2) sets out how Stroud District Council has informed, engaged and consulted people throughout the plan preparation process.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including the results of public consultation.</p> <p>A written ministerial statement was released on 19 January 2021 CDTBC, which sets out the importance of work continuing to advance Local Plans through to adoption by the end of 2023 to help ensure that the economy can rebound strongly from the COVID-19 pandemic.</p>
72, 73, 74, 78, 79, 100, 111, 114, 128, 140, 149, 151, 175,	<ul style="list-style-type: none"> ● Support BaSRAG 	<p>Comment Noted</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
178, 180, 186, 203, 205, 222, 249, 250, 254, 257, 266, 269, 300, 305, 320, 321, 326, 334, 339, 340, 341, 342, 346, 350, 351, 358, 360, 406, 430, 434, 437, 451, 454, 455, 457, 469, 485, 486, 489, 491, 495, 501, 517, 543, 546, 547, 549, 550, 555, 562, 565, 573, 620, 626, 662, 663, 667, 670, 680, 705, 712, 718, 723, 728, 739, 741, 743, 749, 752, 762, 767, 769, 792, 800		
Settlement hierarchy and place making		
71, 72, 78, 119, 124, 130, 152, 158, 185, 197, 198, 214, 225, 248, 272, 292, 320, 363, 368, 369, 381, 388, 426, 432, 443, 445, 446, 448, 512, 533, 536, 552, 557, 573, 574, 592, 643, 712, 717, 721, 725, 728, 733, 748, 756, 759, 789, 794	<ul style="list-style-type: none"> ● Coalescence of Sharpness, Berkeley and surrounding villages: <ul style="list-style-type: none"> ○ Loss of individual communities' character and identity. ○ Loss of distinct communities of Wanswell, Brookend, Abwell, Pitbrook, Newtown, Hinton and Sharpness. ○ Impact on role of Berkeley as historic centre. 	<p>The Council considers PS36 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>Core Policy CP8 New housing development and Core Policy CP4 Place Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.</p>
347	<ul style="list-style-type: none"> ● Impact on Newtown: 	Core Policy CP8 New housing development and Core Policy CP4 Place



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<ul style="list-style-type: none"> ○ Loss of distinct settlement character and community identity. ○ Coalescence with development west of B4066. ○ Object to inclusion of land east of B4066, south of Newtown. 	Making (supported by Delivery Policy ES10) set out requirements for good design to ensure development in sensitive historic locations is contextual and appropriate in townscape, local environment, character and amenity terms.
Infrastructure and developer contributions		
71, 72, 78, 124, 198, 244, 272, 336, 352, 363, 368, 426, 443, 446, 448, 450, 489, 495, 543, 544, 547, 571, 572, 574, 592, 656, 658, 680, 691, 712, 717, 728, 730, 733, 748, 759, 770, 782, 784, 789, 894	<ul style="list-style-type: none"> ● High cost of infrastructure delivery and mitigation will make development unviable: <ul style="list-style-type: none"> ○ Viability not evidenced. ○ Viability questioned by key stakeholder providers. 	The Council's Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
71, 72, 78, 124, 198, 244, 272, 278, 295, 303, 308, 310, 311, 316, 321, 328, 358, 363, 368, 387, 408, 423, 425, 426, 442, 443, 446, 448, 489, 495, 523, 533, 543, 550, 558, 567, 572, 574, 582, 592, 593, 617, 626, 629, 656, 658, 680, 681, 691, 700, 708, 712, 721, 728, 730, 733, 740, 748, 752, 759, 764, 770, 782, 789, 894	<ul style="list-style-type: none"> ● Doubts over delivery of Garden City sustainability/ infrastructure: <ul style="list-style-type: none"> ○ Essential element of Garden City principles. ○ Scale of transport infrastructure necessary to deliver modal shift. ○ Lack of economic value for developing the transport infrastructure. ○ Lack of information on road infrastructure improvements. ○ Transport infrastructure un-costed. ○ Lack of information about timetable for delivery of key infrastructure. ○ No guaranteed delivery of infrastructure. ○ Lack of support from key infrastructure providers. ○ Will require long term subsidised public transport to avoid social and economic isolation 	<p>The District Council and the site promoters are committed to delivering an exemplar development at Sharpness, in accordance with Garden City principles.</p> <p>The policy sets out that a range of tools including a community engagement and stewardship strategy, design codes and a spatial masterplan and implementation plan, to be approved by the District Council, will detail the way in which the new community, land uses and infrastructure will be developed in an integrated and coordinated manner. This is an approach to delivery and governance fully in line with Garden City principles.</p> <p>The scale and type of development (e.g. secondary school and employment) will create a level of self-containment and reduce the need to travel.</p> <p>The site has been modelled within the Traffic Forecasting Study (EB61) and mitigation measures identified for strategic and local roads. Ahead of the EIP, the Council is updating its transport evidence base and documentation. This will be published in due course.</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<ul style="list-style-type: none"> ○ Unrealistic expectation of self-containment. ○ Viability and environmental issues associated with proposed hydroponic cultivation. ○ Lack of detail of Phase 2 and impacts. 	The Council's Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing services including reopening an existing operational railway line to passenger services.
Policy wording modifications: None		
Homes and Communities		
Housing		
695	<ul style="list-style-type: none"> ● Local benefits from social regeneration and residential development. 	Comment Noted
130, 192, 250, 363, 368, 443, 446, 448, 615, 618, 721, 733, 748, 785	<ul style="list-style-type: none"> ● Concern regarding affordable housing for local people: <ul style="list-style-type: none"> ○ Won't deliver promised amount of affordable homes. ○ Concern re affordability and availability for local people. 	Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 4 or more dwellings in designated rural areas, including both Hinton CP and Hamfallow CP. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
147, 276	<ul style="list-style-type: none"> ● Rural community will not benefit from additional housing: <ul style="list-style-type: none"> ○ Lack of benefit to small local businesses. 	New development will bring improvements to local infrastructure, new jobs, improvements
408, 413, 557, 589, 708, 783, 785	<ul style="list-style-type: none"> ● Lack of local demand for housing: <ul style="list-style-type: none"> ○ Lack of uptake at recent Canonbury Rise development, Berkeley (188 dwellings). ○ Slow sales at Cromwell Close development, Newtown (65 dwellings). 	Demand for housing land in the Berkeley area is demonstrated by the positive promotion of sites through the SDLP by Redrow and Lioncourt Strategic Land.
Community facilities		
71, 72, 78, 79, 124, 130, 131, 137, 140, 142, 147, 148, 151, 158, 159, 168, 178, 186, 191, 195, 198, 209, 220, 224, 226, 228, 232, 233, 235,	<ul style="list-style-type: none"> ● Local primary and secondary schools at capacity: <ul style="list-style-type: none"> ○ Children have to travel further outside cluster area for education. ○ No new secondary school proposed until Phase 2. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
<p>237, 243, 244, 248, 249, 255, 266, 270, 272, 279, 285, 290, 292, 295, 303, 306, 307, 308, 311, 320, 326, 334, 363, 368, 369, 371, 378, 380, 381, 382, 408, 416, 425, 426, 432, 437, 443, 444, 446, 448, 455, 459, 461, 462, 469, 482, 485, 498, 508, 510, 515, 516, 531, 533, 536, 543, 544, 547, 552, 553, 557, 571, 574, 582, 586, 589, 592, 613, 618, 628, 629, 636, 643, 653, 656, 658, 678, 680, 681, 699, 712, 717, 721, 722, 724, 733, 734, 741, 748, 753, 759, 783, 784, 785, 789, 796, 800, 804</p>		
<p>71, 72, 78, 124, 131, 137, 140, 142, 147, 148, 151, 158, 159, 186, 195, 198, 205, 209, 210, 224, 226, 233, 235, 237, 244, 248, 249, 250, 255,</p>	<ul style="list-style-type: none"> • Poor access to wider services and facilities, including shops, health and social care provision: <ul style="list-style-type: none"> ○ Change in assessment of access to services and facilities from poor/ very poor to good access. ○ Nearest hospitals 20 miles away in Gloucester and Bristol. 	<p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
272, 279, 288, 295, 303, 306, 307, 308, 311, 320, 334, 336, 348, 359, 363, 368, 371, 382, 388, 426, 432, 443, 445, 446, 448, 461, 462, 469, 485, 494, 498, 508, 510, 515, 516, 531, 533, 536, 544, 547, 552, 553, 556, 571, 572, 574, 582, 592, 613, 618, 628, 629, 636, 653, 656, 658, 678, 680, 712, 717, 721, 734, 741, 748, 759, 783, 784, 785, 789, 800, 804		
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
513, 695	<ul style="list-style-type: none"> • Potential tourism benefits to the local area. 	Comment Noted
695	<ul style="list-style-type: none"> • Opportunity for economic regeneration. 	Comment Noted
158, 164, 320, 381, 489, 519, 523, 567, 573, 586	<ul style="list-style-type: none"> • Detrimental impact on local tourism: <ul style="list-style-type: none"> ○ Historic Berkeley ○ Sharpness Docks ○ Planned Sharpness marina ○ Purton Hulks ○ Wildlife tourism ○ Rural tourism ○ Walking & cycling trails 	Most of these are not contained in PS36 and will benefit from development either enhancing, protecting or bringing new facilities and visitors to the wider area.
489, 764	<ul style="list-style-type: none"> • Detrimental impact on Sharpness working dock: 	PS36 does not contain any working docks and the development will bring in



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<ul style="list-style-type: none"> ○ Potential conflict with residential amenity. ○ Loss of local jobs. 	new job opportunities as part of wider developments in the locality.
5, 71, 72, 73, 78, 79, 124, 137, 147, 178, 180, 185, 191, 198, 209, 224, 226, 228, 229, 233, 235, 236, 248, 272, 279, 281, 282, 283, 294, 295, 306, 307, 311, 316, 326, 339, 350, 360, 363, 368, 378, 381, 382, 408, 413, 426, 432, 443, 446, 448, 489, 495, 498, 515, 516, 536, 547, 556, 571, 572, 574, 586, 593, 629, 636, 646, 656, 658, 680, 717, 721, 728, 730, 733, 747, 748, 756, 759, 770, 778, 784, 789	<ul style="list-style-type: none"> ● Lack of local jobs: <ul style="list-style-type: none"> ○ contrary to Garden Village principles. ○ Increased commuting. ○ Social impacts from potential high unemployment. 	<p>The site will provide 10 hectares of B1, B2 and B8 employment land and ancillary employment uses, to reflect the identified sectoral needs of the District and local area.</p> <p>The relative accessibility of the site and wider settlement to key services and facilities and employment locations is evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Sustainability Appraisal SA Report (objective SA 10) Appendix 3 - 9 (CD3b).</p> <p>Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p>
71, 72, 78, 114, 124, 130, 146, 158, 159, 180, 191, 198, 236, 247, 266, 272, 288, 350, 363, 368, 369, 388, 408, 426, 430, 432, 443, 445, 446, 448, 469, 489, 495, 523, 533, 543, 547, 556, 557, 558, 567, 571, 573, 574, 582,	<ul style="list-style-type: none"> ● Poor location for new employment development: <ul style="list-style-type: none"> ○ Furthest point from anticipated Gloucestershire employment growth point focus between Cheltenham and Gloucester. ○ Poor connectivity and remote from District employment centres. ○ Low historic uptake of available employment land. ○ Focus for warehousing - low employment/ low wages. ○ Viability due to distance from District centres 	<p>The site is adjacent to the Gloucestershire Science and Technology Park at Berkeley and Sharpness Docks and Severnside Distribution Park, which are important employment locations for the District which have received investment recently. The GFirstLEP has invested millions of pounds in the Berkeley GREEN project and Science and Technology Park which are supported in the Local Industrial Strategy and economic regeneration of the area is fully supported by GFirstLEP, Canals & Rivers Trust, Western Gateway, GCC and other organisations – see the STEP Severn Gateway proposal, for example.</p> <p>All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
593, 636, 653, 656, 658, 680, 712, 717, 721, 723, 725, 728, 730, 733, 748, 759, 760, 784, 789, 791, 894	<p>and better alternative locations.</p> <ul style="list-style-type: none"> ○ Threat of disruption from flooding. 	stage. The Environment Agency has no objections to Sharpness new settlement.
423, 489, 543, 573, 783, 785	<ul style="list-style-type: none"> ● Insufficient land allocated for employment development: <ul style="list-style-type: none"> ○ Inadequate for scale of housing development. ○ Inadequate for self containment. ○ Unattractive for proposed knowledge based business park. 	The site will provide 10 hectares of B1, B2 and B8 employment land and ancillary employment uses, to reflect the identified sectoral needs of the District and local area. The site is adjacent to the Gloucestershire Science and Technology Park and offers the potential to provide grow on space. The GFirstLEP has invested millions of pounds in the Berkeley GREEN project and Science and Technology Park which are supported in the Local Industrial Strategy.
71, 72, 78, 124, 198, 426, 443, 446, 448, 523, 567, 574, 656, 658, 680, 712, 717, 721, 728, 730, 733, 748, 759, 789	<ul style="list-style-type: none"> ● Better alternative, existing and planned sites for a knowledge based business park: <ul style="list-style-type: none"> ○ Location not supported by ELR evidence. 	The site is adjacent to the Gloucestershire Science and Technology Park and offers the potential to provide grow on space. The GFirstLEP has invested millions of pounds in the Berkeley GREEN project and Science and Technology Park which are supported in the Local Industrial Strategy.
71, 72, 78, 124, 198, 426, 443, 446, 448, 523, 543, 567, 572, 574, 656, 658, 680, 712, 717, 721, 728, 730, 733, 748, 759, 789	<ul style="list-style-type: none"> ● Site promoters have no established record of delivering commercial developments. 	The site promoters include professionals bringing forward commercial development in the District and who work closely with GFirstLEP.
Retail and town centres		
71, 72, 78, 80, 124, 151, 198, 206, 236, 308, 363, 368, 426, 443, 446, 448, 519,	<ul style="list-style-type: none"> ● Impact of new commercial centre on vitality of Berkeley town centre: <ul style="list-style-type: none"> ○ Impact on Berkeley as the historic local centre. ○ Impact on local independent businesses and 	The commercial centre at Berkeley is likely to benefit from the increased catchment area, particularly during the initial construction phase. There is no evidence that Sharpness new settlement will be detrimental to Berkeley's



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
523, 557, 561, 567, 573, 653, 725, 739, 745, 894	shops.	health. The development will also facilitate new walking and cycling routes to key destinations including to Berkeley GREEN, Newtown /Sharpness and Berkeley town centre. This will bring new customers and business to the existing centres, services and shops.
523, 556, 567, 739	<ul style="list-style-type: none"> Impact of additional traffic and congestion on Berkeley High Street. 	The site has been modelled within the Traffic Forecasting Study (EB61) and mitigation measures identified. There are no significant impacts on Berkeley town centre requiring mitigation. Ahead of the EIP, the Council is updating its transport evidence base and documentation. This will be published in due course.
Travel, transport and highways		
695	<ul style="list-style-type: none"> Benefits from existing road and rail infrastructure. 	Comment Noted
5, 71, 72, 78, 110, 124, 130, 131, 136, 137, 142, 150, 195, 198, 199, 228, 229, 235, 247, 272, 295, 311, 326, 348, 349, 350, 363, 368, 371, 381, 426, 443, 446, 448, 455, 508, 509, 516, 523, 533, 553, 557, 561, 567, 574, 582, 586, 592, 593, 636, 646, 651, 656, 658, 678, 680, 691, 712, 717, 721, 728, 733, 748, 759, 782, 789	<ul style="list-style-type: none"> Lack of public transport: <ul style="list-style-type: none"> No improvements to local bus service provision Stakeholder support for development linked to A38/ M5 corridor. Social isolation. 	Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities
5, 9, 71, 72, 78, 83, 111, 114, 123, 124, 130, 140, 142, 145,	<ul style="list-style-type: none"> Undeliverable rail link: <ul style="list-style-type: none"> Unrealistic proposal. Viability. 	The evidence from the site promoters (932 and EB95) demonstrates that the site has credible proposals for reopening the existing railway branchline to passenger services.



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
146, 154, 158, 159, 160, 178, 180, 185, 198, 199, 220, 222, 224, 228, 229, 232, 233, 236, 243, 247, 248, 266, 269, 272, 276, 288, 292, 295, 303, 320, 325, 326, 334, 339, 346, 348, 350, 358, 363, 368, 369, 375, 381, 388, 391, 408, 413, 421, 423, 426, 430, 432, 435, 443, 444, 445, 446, 448, 455, 461, 462, 468, 469, 482, 494, 495, 508, 512, 516, 523, 543, 546, 547, 548, 557, 567, 571, 572, 573, 574, 582, 592, 593, 636, 648, 651, 656, 658, 680, 681, 712, 714, 717, 718, 721, 724, 725, 728, 730, 733, 748, 759, 760, 766, 770, 778, 782, 784, 789, 796, 800, 804	<ul style="list-style-type: none"> ○ Not supported by stakeholders. ○ No direct link south to Bristol. ○ Cost not justified. ○ Adequate service delivery. 	<p>The PVB and PVC generate a healthy Benefit Cost Ratio (BCR) of 5.03 before adjusting for deadweight and displacement, and 3.22 afterwards.</p> <p>Detailed timetable modelling demonstrates that the planned service can be accommodated on the railway network – both now, and when considered in the context of other planned service changes.</p> <p>There is no direct link south to Bristol but a combination of bus and coach services and a rail service via Cam & Dursley southwards will provide suitable public transport options to Bristol.</p> <p>The site promoters are discussing options for the rail service in partnership with the Vale of Berkeley Railway Trust. The District Council supports these discussions continuing.</p>
7, 9, 12, 71, 72, 78, 83, 105, 111, 114, 123, 124, 126, 128, 130, 131, 137, 140, 142, 143, 144, 147,	<ul style="list-style-type: none"> ● Strategic and local road network, including M5 Junctions 13 and 14, A38, B4066, Alkington Lane, Halmore Lane, Berkeley High Street, inadequate to cope with additional traffic: <ul style="list-style-type: none"> ○ Impact on highway safety. 	<p>The site has been modelled within the Traffic Forecasting Study (EB61) and mitigation measures identified for local roads including the B4066, Alkington Lane, to A38 junctions and to M5 Junction 14. Ahead of the EIP, the Council is updating its transport evidence base and documentation. This will be published in due course.</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
148, 150, 151, 154, 157, 158, 159, 160, 166, 172, 177, 178, 180, 185, 186, 195, 198, 199, 203, 205, 209, 210, 217, 220, 224, 226, 228, 229, 232, 233, 236, 237, 243, 248, 247, 255, 256, 260, 263, 265, 267, 269, 270, 272, 279, 281, 282, 283, 285, 286, 288, 289, 290, 292, 294, 303, 306, 307, 310, 311, 316, 320, 321, 325, 326, 328, 329, 334, 339, 346, 348, 358, 359, 360, 363, 368, 371, 375, 378, 380, 381, 382, 389, 390, 391, 402, 408, 413, 416, 417, 423, 426, 430, 432, 435, 437, 442, 443, 444, 446, 448, 452, 455, 459, 461, 462, 469, 472, 479, 482, 485, 489, 494, 495, 498, 508, 509, 510, 512, 515, 516, 519, 523, 528, 536, 543, 544, 546, 547, 552, 553, 556,	<ul style="list-style-type: none"> ○ Lack of detail of proposed highway mitigation measures. ○ Impact on A38 as M5 relief road. ○ No proposal to extend the bypass from Mobley to the A38. ○ Disruption to farming community. 	



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
557, 561, 567, 571, 572, 573, 574, 582, 586, 589, 592, 593, 613, 615, 628, 629, 636, 651, 652, 653, 656, 658, 678, 680, 681, 691, 699, 700, 701, 710, 712, 714, 717, 721, 724, 725, 728, 730, 733, 734, 741, 746, 748, 753, 759, 780, 782, 783, 785, 787, 789, 794, 796, 800, 804		
71, 72, 78, 124, 180, 185, 198, 199, 266, 350, 358, 363, 368, 421, 426, 430, 443, 444, 446, 448, 546, 547, 548, 571, 573, 574, 582, 593, 680, 712, 717, 721, 725, 728, 733, 748, 759, 784, 789	<ul style="list-style-type: none"> • Unsupported claims for fast coach links: <ul style="list-style-type: none"> ○ Unlikely to deliver modal shift. ○ Additional bus routes not supported by Stagecoach. 	The Council's Sustainable Transport Strategy (EB60a-c) and the evidence from the site promoters (932 and EB95) demonstrate that the site has credible public transport options to supplement existing bus services provided by a range of operators.
71, 72, 78, 124, 151, 203, 348, 573	<ul style="list-style-type: none"> • Impact on highway network from construction traffic. 	Construction traffic will be temporary and managed as necessary, this is not a material consideration not to bring forward development.
110, 130, 146, 151, 209, 248, 269, 276, 289, 303, 311, 321, 340, 360, 363, 368, 375, 381, 423, 430, 443, 444, 446, 448, 469, 479, 495, 517,	<ul style="list-style-type: none"> • Impact on safety and enjoyment of public footpaths and rural lanes by walkers, cyclists and horse riders, including National Cycling Route 41: <ul style="list-style-type: none"> ○ Diversion of Severn Way away from estuary. ○ Reduction in public rights of way across the site without adequate replacement. ○ No provision for equestrian community. 	<p>A master plan will be required to address layout which prioritises walking and cycling and access to public transport over the use of the private car by, for example, providing a series of walkable/cyclable neighbourhoods linked by direct and high-quality cycle and walking routes that are shorter in distance than the highway network, in accordance with Manual for Streets;</p> <p>High quality and accessible walking and cycling routes within the site including the retention and diversion of existing footpaths as necessary, the</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
523, 528, 536, 548, 557, 567, 586, 636, 652, 678, 681, 699, 709, 721, 723, 733, 748, 758, 778, 789, 791, 796	<ul style="list-style-type: none"> ○ Provision of safe public footpath routes compatible with children. ○ Provision of segregated pedestrian and cycle routes. 	provision of connections to employment, local centre, education and contributions towards the enhancement of off-site walking and cycling routes to key destinations including to Berkeley GREEN, Newtown /Sharpness and Berkeley town centre and linking to the national cycle and canal network.
Infrastructure		
80, 103, 111, 118, 121, 129, 154, 164, 166, 185, 191, 194, 199, 203, 211, 213, 225, 229, 245, 249, 250, 251, 263, 266, 269, 326, 329, 349, 353, 354, 369, 372, 380, 416, 451, 472, 530, 562, 589, 646, 697, 703, 717, 749, 754, 756, 765, 774, 778, 791, 795, 797, 802, 804	<ul style="list-style-type: none"> ● General infrastructure limited and inadequate to cope with additional demand: <ul style="list-style-type: none"> ○ Lack of new infrastructure proposed. ○ Requires upfront infrastructure development to support significant growth. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
71, 72, 78, 123, 124, 130, 159, 198, 224, 233, 287, 361, 363, 368, 421, 426, 432, 443, 446, 448, 455, 489, 509, 547, 557, 573, 574, 582, 586, 629, 636, 643, 678, 680, 712, 721, 723, 728, 733, 748, 759, 789	<ul style="list-style-type: none"> ● Sewerage treatment capacity inadequate to cope with additional development: <ul style="list-style-type: none"> ○ Requires major investment. ○ Existing hamlets without mains sewerage. ○ No current plans for significant stakeholder investment or upgrades. ○ Potential pollution to River Severn. ○ Evidence for HRA assessment of mitigation to ensure water quality and waste water treatment. 	All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP (EB69). The Policy also contains the criterion: 10. A positive strategy for mitigating flood risk including attenuating and disposing of surface water through sustainable drainage systems (SuDS) that can form part of the GI network;
247	<ul style="list-style-type: none"> ● Lack of detailed infrastructure proposals: 	On-site specifics, including pedestrian, cycle and vehicular site access,



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
	<ul style="list-style-type: none"> ○ Climate mitigation measures. ○ Integration of new walking/ cycling routes with existing network. ○ Segregation of walkers / cyclists/ cars. ○ Future maintenance of GI. 	<p>highway safety and the incorporation of the existing PROW, to be addressed at the masterplan / planning application stage, in agreement with Gloucestershire Highways. Delivery Policy E112 requires development proposals that are likely to have a significant impact on the local transport network to submit a Transport Assessment, as well as a Travel Plan.</p> <p>New Core Policy DCP1 Delivering Carbon Neutral by 2030 sets out the overarching requirements for all new development, to support the Council’s target to become Carbon Neutral by 2030. All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.</p> <p>Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.</p>
247	<ul style="list-style-type: none"> ● 132kV and 33kV electrical power lines cross the site: <ul style="list-style-type: none"> ○ Requires consultation with Western Power Distribution. ○ Implications for location of houses, placing underground or diverting power lines. 	<p>All sites have been assessed with the statutory bodies, National Grid and Western Power Distribution. Any mitigation required is included in the IDP or if design led will be addressed at the master plan stage.</p>
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
<p>71, 72, 78, 105, 123, 124, 130, 131, 151, 158, 159, 177, 178, 180, 198, 199, 205, 213, 214 , 217, 232, 233, 242, 243, 272, 292, 295, 303, 311, 316, 321, 328, 346, 352, 363, 368, 381, 388, 391, 409, 426, 430, 432, 443, 444, 445, 446, 448, 455,</p>	<ul style="list-style-type: none"> ● Impact on Severn Estuary SAC/ SPA/ Ramsar: <ul style="list-style-type: none"> ○ Insufficient evidence regarding impact avoidance and mitigation. ○ Potential adverse environmental effects identified in HRA and SA. ○ HRA underestimates the diversity of ecology eg No mention of the critically endangered Eel and the key role of the River Severn in its breeding cycle. ○ Increased disturbance and recreational use. ○ Wind energy development impacts. ○ Impact during construction phase. 	<p>The development will mitigate any impacts on the Severn Estuary and is supported by Natural England.</p> <p>The policy contains the following criteria to reduce the impact and mitigate where required:</p> <p>4. A network of multifunctional Green Infrastructure throughout the development in accordance with Building with Nature standards and in excess of local provision standards to provide for public open space, including the provision of SANG with viewing platforms over the Severn Estuary and a diversion to the Severn Way, to absorb human recreational activity, particularly dog walking, away from the Estuary shoreline and accessible natural green space, including tree planting to achieve carbon</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
469, 489, 495, 509, 517, 523, 543, 547, 550, 557, 558, 567, 571, 572, 573, 574, 582, 593, 613, 636, 643, 653, 656, 658, 678, 680, 681, 697, 698, 700, 712, 714, 717, 721, 723, 725, 728, 733, 734, 739, 745, 748, 756, 759, 760, 764, 766, 770, 777, 782, 784, 789, 791, 794, 796, 802, 804, 894	<ul style="list-style-type: none"> ○ Potential pollution impacts – air, noise, surface water runoff. ○ Impact on Slimbridge Wildfowl and Wetlands Centre (WWT) and bird migration. ○ Needs to include assessment of impact avoidance and mitigation on mudflats SSSI extending south to Thornbury. ○ SANG located within flood risk zones and likely to be subject to flood risk. ○ SANG is not a realistic alternative to the estuary, lacks Severn views and, together with diversion of the Severn Way, will reduce public access. 	<p>capture and areas for community food production;</p> <p>5. On site and, if necessary, off site work to mitigate and manage the identified impacts of development upon the Severn Estuary SAC/SPA/Ramsar site;</p> <p>6. A managed new nature reserve, including a new high tide roost area to complement the existing roost site at Berkeley Pill and other measures to deliver a net gain to local biodiversity;</p>
5, 7, 107, 110, 114, 137, 150, 157, 177, 193, 211, 224, 228, 240, 245, 248, 249, 250, 266, 276, 281, 282, 283, 286, 288, 289, 290, 292, 295, 306, 307, 320, 325, 326, 328, 329, 347, 359, 364, 375, 378, 380, 382, 402, 408, 413, 437, 447, 455, 459, 461, 462, 468, 473, 479, 509, 516, 546, 547, 567, 615, 701, 709, 710, 740, 752, 753, 754, 787	<ul style="list-style-type: none"> ● Impacts on wider natural environment and wildlife: <ul style="list-style-type: none"> ○ Loss of biodiversity and endangered species. ○ Loss of hedgerows, trees and woodland. ○ Neighbouring farmland managed under DEFRA higher level stewardship scheme, including wild flower meadows and protected species. ○ Loss of water meadows. ○ Contrary to identified Plan priority issues. 	<p>The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network. Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.</p>
79, 110, 145, 146,	<ul style="list-style-type: none"> ● Impact on community cohesion, residential amenity 	<p>Sharpness new settlement will provide a high quality development which</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
148, 172, 209, 227, 240, 252, 269, 288, 295, 325, 329, 349, 360, 389, 369, 375, 378, 380, 382, 417, 432, 473, 516, 523, 552, 556, 567, 571, 572, 573, 582, 646, 698, 700, 709, 714, 722, 725, 753, 764, 774, 784, 797	<p>quality of life and health and wellbeing of existing residents:</p> <ul style="list-style-type: none"> ○ Long term disruption over many years. ○ Traffic noise. ○ Light pollution. ○ Social isolation. ○ Increased crime. ○ Cultural change from reduced access to the countryside and River Estuary. ○ Reduced access to the Severn Estuary. ○ Impact on physical and mental health from Loss of green space, rural access and amenity. 	<p>will enhance the range of services and facilities available within the local area. New employment, secondary school, local centre and large areas of new accessible green spaces and a nature reserve will positively enhance the local area and benefit existing residents as much as new residents.</p> <p>The first phase, the subject of this Local Plan, is largely located away from existing residential areas and therefore:</p> <ul style="list-style-type: none"> • this will minimise direct disruption during the construction phase • will not significantly impact on access to existing areas of countryside <p>Improvements to public transport will also benefit existing residents. The development will also enhance local tourism opportunities by facilitating the restoration of the Berkeley branchline to passenger services. The site promoters are working with the Berkeley Vale Heritage Railway as part of a phased approach to delivery.</p>
80	<ul style="list-style-type: none"> • Area should be protected for local wildlife and green spaces. 	<p>A network of multifunctional Green Infrastructure will be provided throughout the development in accordance with Building with Nature standards and in excess of local provision standards to provide for public open space, including the provision of SANG with viewing platforms over the Severn Estuary and a diversion to the Severn Way, to absorb human recreational activity, particularly dog walking, away from the Estuary shoreline and accessible natural green space, including tree planting to achieve carbon capture and areas for community food production;</p>
5, 71, 72, 78, 110, 111, 114, 124, 130, 140, 143, 151, 164, 178, 186, 198, 205, 214, 222, 230, 232, 233, 244, 249, 247, 248, 265, 266, 278, 286, 289, 290, 295, 303, 316, 321, 339, 340, 348, 349, 363,	<ul style="list-style-type: none"> • Increased flood risk from development in the flood plain and from climate change: <ul style="list-style-type: none"> ○ Potential under estimation of flood risk. ○ Uncertainty regarding the long term effects of climate change identified in the SA. ○ Large tidal range and increased risk of coastal surges. ○ Flood risk mitigation costs unknown and impact on viability. ○ a detailed site-specific FRA and surface water 	<p>All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage. The Environment Agency has raised no objections.</p> <p>The following criteria are also contained within the policy:</p> <p>10. A positive strategy for mitigating flood risk including attenuating and disposing of surface water through sustainable drainage systems (SuDS) that can form part of the GI network;</p> <p>11. Adequate and timely infrastructure including off-grid measures such as constructed wetlands to tackle wastewater generated by the development,</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
368, 369, 375, 381, 382, 391, 413, 416, 421, 426, 432, 435, 443, 446, 448, 469, 479, 489, 509, 523, 536, 543, 547, 550, 554, 556, 557, 558, 567, 571, 572, 573, 574, 578, 586, 592, 593, 613, 615, 646, 680, 691, 700, 709, 710, 711, 712, 717, 721, 728, 733, 748, 756, 759, 768, 782, 784, 785, 789, 791, 796, 800,	<p>drainage strategy is required which needs to precede allocation.</p> <ul style="list-style-type: none"> ○ Impact of additional necessary flood defences on Severn Estuary SAC/ SPA/ Ramsar. ○ Potential conflict between SFRA and HRA regarding flooding of proposed SANG. ○ Impact on existing properties including houses not connected to mains drainage. ○ Insurance implications for householders. 	<p>in agreement with the relevant water company, and to address any other constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan;</p>
Landscape		
71, 72, 130, 217, 256, 363, 368, 443, 448, 489, 562, 646, 721, 733, 748	<ul style="list-style-type: none"> ● Significant urbanisation impact on the unique estuarine landscape. 	<p>Landscape evidence demonstrates that the site contains a mix of medium and high landscape sensitivity. Development will require a landscaping strategy, including strategic landscaping to provide accessible open space, minimise landscape impacts and safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.</p>
144, 247, 256, 388, 391, 435, 445, 446, 523, 567, 573, 721, 741, 780	<ul style="list-style-type: none"> ● Visual impact from prominent location within the Severn Vale and on the Severn Estuary: <ul style="list-style-type: none"> ○ Area of significant beauty. ○ Little topographical variation to absorb visually intrusive development. ○ Impact on views from the Cotswolds AONB. ○ Impact on views from the Forest of Dean. 	<p>Landscape evidence demonstrates that the site contains a mix of medium and high landscape sensitivity. Development will require a landscaping strategy, including strategic landscaping to provide accessible open space, minimise landscape impacts and safeguard and enhance local biodiversity, to be addressed at the masterplan/ planning application stage.</p> <p>The following criteria in the policy are required to minimise visual impact:</p> <p>4. A network of multifunctional Green Infrastructure throughout the development in accordance with Building with Nature standards and in excess of local provision standards to provide for public open space, including the provision of SANG with viewing platforms over the Severn</p>



Site Reference: Strategic Site Allocation Policy PS36 Sharpness new settlement		
		<p>Estuary and a diversion to the Severn Way, to absorb human recreational activity, particularly dog walking, away from the Estuary shoreline and accessible natural green space, including tree planting to achieve carbon capture and areas for community food production;</p> <p>9. Structural landscaping buffers along boundaries incorporating existing and new native hedgerows and trees and linking with existing green infrastructure;</p> <p>13. A bespoke and innovative layout, density and built form, centred on neighbourhoods with distinct characters which respond to the landscape and heritage context within the Berkeley Vale;</p>
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
71, 72, 78, 124, 198, 214, 272, 308, 363, 368, 412, 415, 426, 446, 448, 543, 571, 574, 656, 658, 680, 712, 717, 721, 748, 759, 789	<ul style="list-style-type: none"> • Concerns over the deliverability of development within the plan period: <ul style="list-style-type: none"> ○ Logistical difficulties from remote location. ○ Are proposed annual delivery rates achievable? ○ Industry concerns about delivery rates. ○ Promoter competence and experience . 	<p>The site is not at a remote location and is only 5-7 mins drive time from the A38, with a good local road network which provides HGV access to Sharpness Docks.</p> <p>Demand for housing land in the Berkeley area is demonstrated by the positive promotion of sites through the SDLP by Redrow and Lioncourt Strategic Land. Lioncourt has successful experience of planning for other new settlement locations within the country.</p> <p>Statements from the promoters (932 and EB95) demonstrate that the site is deliverable with the potential to exceed the delivery rates identified by the Council in the SDLP given the potential for multiple sales outlets and the strength of the market.</p>
Policy wording modifications: None		



PS37

Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
Number of representations: 220	Support: 26	Object: 191
Stakeholders	Comments	Stroud District Council Response
Support		
Sport England (133)	<ul style="list-style-type: none"> Sport England supports the Wisloe new settlement allocation, and we would advise applying our active design principles for the housing layout 	Comment noted
Policy wording modifications: None		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> GWT is neutral on this allocation. 	Comment noted
	<ul style="list-style-type: none"> The provision of 8ha of SANG and 35 ha of new nature reserve is supported, however, the area of these allocations must be reviewed based on the evidence of existing and potential users to ensure they are sufficient. 	
	<ul style="list-style-type: none"> Development should seek to deliver habitat enhancements that benefits the priority species 	Comment noted
	<ul style="list-style-type: none"> An EIA is undertaken with a detailed assessment of cumulative impacts and recreation pressure on internationally, nationally and locally designated sites. 	Comment noted
	<ul style="list-style-type: none"> If there are no adverse ecological impacts following mitigation, Biodiversity Net Gain requirements are set at a minimum of 20%. 	Comment noted
Policy wording modifications: None		
Berkeley Town Council (477)	<ul style="list-style-type: none"> This 1500 house development is situated on the A38 and is close to a range of local services in Cam and Dursley and the station. The development is on a sustainable movement corridor. 	Comment noted
	Policy wording modifications: None	
Savills (UK) Limited for The Berkeley Estate (878)	<ul style="list-style-type: none"> The site is flat and is not the subject of any landscape/environmental designations that prevent its development. Existing vegetation along the north 	Comment noted



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
	<p>eastern and north western boundaries means the site is already well visually and physically screened, so would therefore help to provide a strong landscaped edge to the north of the allocation.</p> <ul style="list-style-type: none"> The Draft VA highlights that the Wisloe new settlement presently is demonstrating ‘marginal’ viability. Although TBE welcomes the Council’s aspirational approach to new development here, the supporting SDC needs to ensure that the items listed within this policy are both deliverable and viable. 	
Policy wording modifications: None		
Stagecoach West (952)	<ul style="list-style-type: none"> Stagecoach is able to strongly support this allocation which it believes to be in conformity with NPPF, to be effective in strongly supporting the delivery of the Strategic Objectives and the Key Priorities of the plan and to be appropriately and properly evidenced sufficient to justify allocation. 	Comment noted
	<ul style="list-style-type: none"> The proposed allocation PS34 Wisloe New Settlement conforms from first principles with the requirements of NPPF at paragraph 103 which require that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.” The site entirely aligns with the emerging suite of local plan strategic and development management policies, including CP5, CP13 and Development Management policy EI12. Draft policy EI12, which we propose should be modified, even in its current form requires that “Major development should be located in areas which are already well served by public transport and have access to a range of local facilities within easy walking and cycling distance.” 	Comment noted



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
	<ul style="list-style-type: none"> The identification of Wisloe as a New Settlement, directly on the junction of 2 Sustainable Movement Corridors is entirely consistent with the spatial strategy. This offers very particular scope to achieve significant augmentation of the bus and coach service offer serving the site and the wider plan area, which is currently quite limited. This is a particular and unique merit of this site. 	Comment noted
	<ul style="list-style-type: none"> A broad strategy for bus service augmentation for the site is clearly identifiable. This will synergise very with other proposed allocations at NW Draycott and around junction 12 of the M5, reflecting the benefits of steering development towards the Sustainable Movement Corridors, and in so doing leveraging density of flow. This synergy makes it highly likely that a higher level of bus and coach service will be achievable to and from the site, than that which would be supportable by this development alone. This aligns entirely with the Government's National Bus Strategy for England (April 2021) which sets expectations for "Super-routes" offering direct regular inter-urban links between main settlements in more rural areas. 	Comment noted
	<ul style="list-style-type: none"> The site also will benefit from attractive walking and cycling connections both for recreational use, but most importantly, for other regular journey purposes. Segregated cycle facilities can be extended to the site from Dursley and Cam. While it is a distinct new settlement, the relatively short distances involved greatly support high levels of active travel from the site, as well as bus use, especially with greatly improved frequencies being 	Comment noted



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
	on offer from the development.	
Policy wording modifications: None		
Stantec (955) Site promoter	<ul style="list-style-type: none"> Detailed ALC survey identifies the majority of the site comprising land of Grade 2, with small areas of Subgrades 3a and 3b. In a plan making context the policy in the NPPF (paragraph 171 footnote 53) is, where there is a choice between sites, to use land of poorer quality in preference. This is not a bar to development of agricultural land, but the existence of significant areas of BMV must be taken into account, and there is preference towards using areas of poorer quality. <p>This report therefore sets out the land quality of the site, identifies the order of magnitude of the economic benefits involved, and reviews the apparent lack of availability of land of poorer quality that could be used in preference.</p>	Comment noted
	<ul style="list-style-type: none"> The purpose of this framework is to demonstrate that the site allocation is sound and deliverable from a highways and transport perspective in being able to meet the related emerging Local Plan policy requirements. 	Comment noted
	<ul style="list-style-type: none"> This framework has proven that a sustainable access strategy can be achieved to ensure that the proposed site allocation is deliverable and can be provided to accord with the overall Local Plan objectives of reducing transport related environmental impacts in being able to deliver a transformative rebalancing of transport provisions in favour of sustainable modes. The access strategy which has informed the concept masterplan has incorporated numerous potential sustainable travel 	Comment noted



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
	related interventions in relation to a sharing economy package, active modes, micro-mobility and public transport that can be imbedded into the design of a new community.	
	<ul style="list-style-type: none"> The concept masterplan and supporting access strategy demonstrates that the development of a new community at Wisloe can provide a self-contained settlement whilst also helping serve the needs of surrounding communities. 	Comment noted
	<ul style="list-style-type: none"> Whilst sustainable modes of transport can be prioritised over that of the private car, the access strategy confirms that suitable vehicular site access arrangements can be achieved and that associated traffic impacts of the development can be mitigated. 	Comment noted
Policy wording modifications: None		
Object		
SDC Cllr Haydn Jones (500)	<ul style="list-style-type: none"> Agricultural Land Classification. Site has been assessed against a Sustainability Appraisal based upon a flawed Agricultural Land Classification report provided by the site proposer. The land is classified by Natural England as ALC2. 	The site has been resurveyed and now accurately graded.
	<ul style="list-style-type: none"> Noise - The site is located adjoining and to the west of the M5 motorway and main Gloucester-Bristol railway. It is adjoining and east of the A38. The A4135 bisects the site going in an approximate west - east direction. There is no practical method to mitigate how these damaging emissions would impact on the health, residential and business amenity proposed for this site 	With suitable site layout and noise mitigation measures, suitable noise levels can be provided for residential accommodation.
	<ul style="list-style-type: none"> This site is directly functionally linked to the Upper Severn SSSI/SPA/SAC/RAMSAR internationally and nationally protected reserve. Development here would destroy habitat that it is not possible to 	The available evidence does not point to the site being important for biodiversity.



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
	recreate or mitigate locally. It would go directly against national policy and the policies within this plan to deliver habitat and ecological gain.	
	<ul style="list-style-type: none"> It is not practical or possible to maintain discrete communities with the size of development proposed which bridges from Cambridge in the north, via Slimbridge to Gossington in the south, whilst joining with existing and proposed schemes to the east at PS24 in Cam and the ongoing Box Road development. 	The development will provide structural landscaping to prevent physical and visual coalescence with adjoining villages. The development will benefit adjoining communities by providing additional facilities and services and better access to the railway station at Cam.
	<ul style="list-style-type: none"> The promoters of PS37 were unaware of the high pressure gas pipeline that runs through the middle of the site south of the A4135 and across part of the northern site. The original flawed ALC consultants work resulted in an HSE investigation as it is believed the safe perimeter of this hazard was infringed. The HSE report recommends against residential development. 	This constraint has been investigated by Wales & West Utilities and a preferred route option for its diversion in sympathy with the developers' concept has been recommended which stays largely within the noise buffer area and land owned by the developer.
	<ul style="list-style-type: none"> The combination of existing ongoing development in Cam, together with proposals at PS24 Cam and Wisloe would create significant extra vehicle traffic despite any efforts, as yet undefined, unconfirmed and unfunded, to limit car travel from the site. Employment will be limited and travel to work via the road network inevitable. There is no nearby motorway access and this pressure will manifest on the local road network together with junctions 13 and 14 of the M5. 	The site, together with other allocations, has been modelled within the Traffic Forecasting Study (EB61) with minimal mitigation measures required on the local road network. The report also assesses impacts on and mitigation measures for junctions 13 and 14. Ahead of the EIP, the Council is updating its transport evidence base and documentation. This will be published in due course.

Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
	<ul style="list-style-type: none"> Sustainable Transport. PS37 site promoters and SDC officers have discussed improving access from the proposal site to Cam and Dursley rail station. Plans to provide direct access from the site to the station have been mentioned but no firm proposals on how this would be realised, funded and delivered have been produced. 	Policy PS37 requires access improvements to Cam and Dursley station for sustainable modes and contributions towards the enhancement of passenger facilities. The promoters latest masterplan envisages a new bridge over the M5 which would deliver a step change in access to sustainable forms of transport in the wider area.
	<ul style="list-style-type: none"> Much is made by SDC strategic planners of how proposed site PS37 performs moderately well against the sustainability appraisal. Planners have cited consistently how this has played a fundamental part in their selection process. However, the sustainability appraisal is inaccurate and seriously flawed. Not only is the sustainability appraisal flawed it has been inaccurately interpreted as a means to exclude sites PGP1 and PGP2 from the Additional Housing Options consultation October 2020 	The Sustainability Appraisal (CD3 and appendices) is a comprehensive and robust assessment of all reasonable strategy, policy and site options considered as part of the local plan review process. The site at Wisloe performs well compared against reasonable alternatives.
	<ul style="list-style-type: none"> Footpaths/PROW. Footpaths currently cross the PS37 proposed site particularly south of the A4135. These currently cross the railway from the PS37 site south of the A4135 via level crossing Slimbridge 46 and Slimbridge 53 Network Rail have confirmed that they will forbid any development that increases or is likely to increase pedestrian traffic crossing at these points. Network Rail dictate that the only way they would accept mitigating the hazard would be to provide bridges or re-route around the railway infrastructure. 	It is anticipated that the rail crossings will be closed for safety reasons.



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement	
<ul style="list-style-type: none"> • Flooding. Slimbridge and Cambridge have suffered significant flooding events in recent times. The responsible water authorities have accepted the inadequacies of their infrastructure and have been investing heavily in adding greater capacity and modelling to produce greater resilience. None of this work has so far managed to address the practical challenge of addressing surface water flooding in particular. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
<ul style="list-style-type: none"> • Minerals. The whole of PS37 lies within a Minerals Safeguarding Area. No plan to identify how the underlying minerals would be safeguarded, removed as required and the land reinstated has been produced. 	Location within a Minerals Safeguarding Area is a secondary constraint where the effects upon the mineral resource can generally be mitigated by the extraction of minerals prior to development taking place. Impacts on MSAs are taken into account within the Sustainability Appraisal (CD3 and appendices) and The Assessment of Strategic Development Opportunities (EB17).
<ul style="list-style-type: none"> • A report completed by consultants for the proposer recognised that archaeology was present but appears to deliberately diminish the importance of finds in direct opposition to contemporary evidence and findings from extensive local fieldwork and reports by acknowledged national and local experts. 	Assessments have highlighted archaeological remains but none of these are anticipated to be of such significance that they would preclude such redevelopment. However, a programme of archaeological evaluation works would be undertaken and it may be possible to preserve some of the identified archaeological resource in-situ.
<ul style="list-style-type: none"> • The historic open agricultural fields with typical Severn Vale dispersed hedgerows provide the crucial visual and practical distance between Slimbridge settlements that would be completely destroyed by development including introduction of alien artificial green infrastructure. 	The site is of low landscape sensitivity and development will provide structural landscaping to prevent physical and visual coalescence with adjoining villages.
<ul style="list-style-type: none"> • PS37 is some 2km distant at its nearest point from the Cotswold AONB. Views out of the site and Slimbridge community towards the AONB Cotswold escarpment are unbroken, far reaching and significant. The precipitous rising, high escarpment and unbroken views towards the feature provide a 	The site is of low landscape sensitivity. Neither Natural England nor the AONB Board have objected to the allocation of the site.



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
	spectacular backdrop when seen from the the typical flat, Severn Vale landscape. These unbroken views are valued by local people and visitors alike and would be damaged by built form in the foreground.	
Policy wording modifications: None		
SDC Cllr Gordon Craig (665)	<ul style="list-style-type: none"> Question the grade of land on this site which has been rather conveniently reclassified 	The site has been resurveyed and now accurately graded.
Policy wording modifications: None		
Slimbridge Gardening Club (823)	<ul style="list-style-type: none"> Flooding will be made worse 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
	<ul style="list-style-type: none"> The local infrastructure gaps, new school, new road, bridge Cam station is at capacity. 	The Infrastructure Delivery Plan (EB69) has assessed the infrastructure requirements. There are no significant issues identified for this site that cannot be overcome.
	<ul style="list-style-type: none"> Gas pipeline can't be moved 	This constraint has been factored into the cost of delivering the development.
	<ul style="list-style-type: none"> Survey showed the noise level to be in excess of 80dB 	With suitable site layout and noise mitigation measures, suitable noise levels can be provided for residential accommodation.
	<ul style="list-style-type: none"> Can't build on grade 2 agricultural land and be carbon neutral 	Whilst grade 2 agricultural land is a constraint, it is not an absolute constraint and taking account of all sustainability criteria, the site performs relatively well against reasonable alternatives. The form and location of the development provides the opportunity to deliver an exemplar development in terms of reducing carbon.
	<ul style="list-style-type: none"> Spoil rural setting and create urban sprawl 	The site is of low landscape sensitivity and development will provide structural landscaping to prevent physical and visual coalescence with adjoining villages.
Policy wording modifications: None		

Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
Ridge and Partners LLP for Bloor Homes Western (911)	<ul style="list-style-type: none"> Site should be removed for the following reasons: <ul style="list-style-type: none"> Multiple landownerships and so complex land assembly will be required, thus making the site highly likely to be undeliverable in the time period. 	The site is not subject to complex land ownerships. There are two main landowners who are committed to delivering the development.
	<ul style="list-style-type: none"> It is not clear whether a viability assessment of the site has been undertaken to include; unusual site costs, noise and reduced developable area 	The Council's Viability Assessment (May 2021) (EB70) is a high-level study that is seeking to capture the generality rather than the specific. The assessment has modelled the cost of policies and site infrastructure requirements against market values. Ahead of the EIP, the Council is updating its viability evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> Development of this size would not be sufficient to deliver the infrastructure and facilities and services required to achieve its objectives around self-containment. 	It is not claimed that the site will deliver full self-containment. However, the infrastructure provided, combined with its sustainable location in terms of access to rail and proximity to a Tier 1 settlement mean that the site will be sustainable.
Policy wording modifications: None		
Lichfields for Charfield Landowners Consortium (923)	<ul style="list-style-type: none"> It is essential that a full assessment of this new allocation and its impact on Junction 14 is carried out. <ul style="list-style-type: none"> Statement of Common Ground with South Gloucestershire on infrastructure matters and cross boundary matters is incomplete. 	The site has been modelled within the Traffic Forecasting Study (EB61). Ahead of the EIP, the Council is updating its transport evidence base and documentation. This will be published in due course. The Council has a signed SOCG with South Gloucestershire Council as set out in the Duty to Cooperate Statement (EB3) and both authorities are working closely on a Funding and Delivery Strategy.
	Policy wording modifications: None	
Slimbridge Parish Council (953) & Wisloe Action Group (954)	<ul style="list-style-type: none"> SPC strongly object to the Wisloe allocation on the basis that it is an unsuitable, undeliverable and fundamentally an unsustainable location to accommodate a new garden village. 	Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection. The site performs relatively well compared to other strategic sites and reasonable alternatives. The site is demonstrably deliverable.



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
Supported by: 666, 729	<ul style="list-style-type: none"> SDC’s decision to include Wisloe New Settlement in the Regulation 19 LPR is not supported by evidence nor the outcomes of consultation in the plan making process. Members of SDC’s Planning Review Panel clearly recognised the risks associated with allocating it in the Regulation 19 LPR when it failed to agree on its inclusion after 3 years of discussion. 	The evidence demonstrates that the site performs relatively well compared to other strategic sites and reasonable alternatives. Whilst the local ward councillor does not support the allocation, the Council supported its allocation at its meetings in April 2021.
	<ul style="list-style-type: none"> SPC and WAG have repeatedly highlighted issues at the various consultation stages which, as demonstrated in these representations, remain unresolved. Rather, it is SPC’s firm view that the technical evidence supporting these representations demonstrates that the Council’s aspirations for Wisloe New Settlement to deliver significant social and economic benefits (such as policy compliant affordable housing provision), biodiversity net gain, high quality design, and carbon neutral development by 2030 are fundamentally unrealistic and unachievable. 	The evidence submitted by the Council and by the site promoter demonstrate that the site is well located relative to Cam & Dursley, the Cam & Dursley rail station and the strategic and local bus and cycle and walking networks to be in a sustainable location, and will deliver a range of housing and community services and facilities, a high degree of biodiversity net gain and net carbon zero development to meet the objectives of the SDLP. The development of 1,500 dwellings over an 18-year period is reasonable and recent rates of building demonstrate that this level of development is achievable within Stroud District.
	<ul style="list-style-type: none"> In order for the LPR to be found sound at examination, Wisloe New Settlement should be deleted as it is not needed and would fail to adhere to Garden City principles and the other strategic objectives of the LPR. It would lack the critical mass to deliver the high sustainability standards that would be required given the very significant infrastructure costs associated with the project. 	The site is needed to help deliver the housing requirement for the District. There is no evidence that the site would not deliver the policy requirements set out in the SDLP. The site is large enough to deliver the policy requirements set out in the SDLP. Full self-containment is not achievable from a development of this size, but the site’s location makes significant modal shift achievable for those journeys still necessary.
	<ul style="list-style-type: none"> SPC considers that the proposed Wisloe New Settlement shares many of the deficiencies highlighted by the Uttlesford, Hart and North Essex Local Plan Examination Inspectors (as discussed in this representation), which resulted in the eventual 	The site is being actively promoted and has not been subject to any significant objections in principle from statutory consultees. The Council’s Infrastructure Delivery Plan (EB69) does not identify any significant infrastructure issues in the vicinity of the site. The site has been modelled within the Traffic Forecasting Study (EB61) with minimal mitigation



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
	deletion and removal of proposed garden communities from those Draft Plans.	measures required on the local road network. The Council's Viability Assessment (May 2021) (EB70) has modelled the site and the site performs better than all other strategic sites in the SDLP.
	<ul style="list-style-type: none"> We consider that there would be no adverse implications on the overall housing supply if Wisloe New Settlement is removed given that the objectively assessed housing need for the Plan period (including any unmet needs from neighbouring authorities) can still be met, including an adequate buffer. Indeed, its removal would assist in ensuring that unnecessary competition does not harm sales of committed and proposed housing developments to the north of Cam and other more sustainable sites in the Berkeley Cluster. The LPR would thus only be effective with Wisloe New Settlement removed. 	The site is needed to help deliver the housing requirement for the District with headroom to provide flexibility to the market. There is no evidence that the allocation of the site would lead to unnecessary competition nor that it would damage sales at other sites.
	<ul style="list-style-type: none"> Our site appraisal finds that PS37 is constrained by a number of factors. Of greatest importance in landscape character terms is the impact that development within PS37 would have on the local settlement pattern, both the sense of separation between settlements in Slimbridge, and their separation with Cam. This appraisal has found that PS37 would harm the identity of the separate settlements within Slimbridge by connecting them along the A38 and Dursley Rd, and through visual coalescence. This would result in the loss of a distinctive and valued characteristic of Slimbridge Parish. 	The site is of low landscape sensitivity and development will provide structural landscaping to prevent physical and visual coalescence with adjoining villages.
	<ul style="list-style-type: none"> Furthermore, the ability to deliver a new settlement in accordance with Garden City Principles is undermined by a number of constraints which impact upon the availability of developable land 	The SDLP and the masterplan work provided by the site promoters demonstrates that a high quality development can be achieved on the site. The extent of the site as shown in the SDLP is actively supported by landowners for development. Wales & West support the diversion of the gas



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
	<p>and fragment the site. These include:</p> <ul style="list-style-type: none"> ○ Gaps in the connectivity of available land, as a result of landowners not promoting ○ land, including White House, and land north of Wisloe Rd. ○ Land immediately alongside the M5 and railway which would have limited connectivity ○ with the surrounding landscape and is likely to have poor residential amenity. ○ Infrastructure including a high-pressure gas pipeline and the A4135. ○ Areas at risk of flooding, including from fluvial and surface water sources. ○ Areas with high potential for archaeology 	<p>pipeline to a location within the green infrastructure and noise buffer area. The SFRA Levels 1 & 2 (EB54) demonstrates the site is suitable for allocation with on-site specifics to be agreed at the planning application stage. The site is expected to result in significant biodiversity net gain, over the Government’s intended minimum of 10%, through green infrastructure planting. The available historic environment records have been assessed by Cotswold Archaeology and Gloucestershire County Council and the conclusion at this Local Plan stage is that none of the assets are anticipated to be of such significance that they would preclude redevelopment.</p>
	<ul style="list-style-type: none"> ● The constraint presented by the location of PS37 and its role in maintaining separate settlement identities cannot be overcome through design or expensive infrastructure and this significantly undermines the suitability of PS37 for large scale residential development. 	<p>The site is of low landscape sensitivity and development will provide structural landscaping to prevent physical and visual coalescence with adjoining villages.</p>
	<p>Policy wording modifications:</p>	
	<ul style="list-style-type: none"> ● To address the soundness issues, we propose that: <ol style="list-style-type: none"> 1. Wisloe New Settlement (Policy PS37) should be deleted as an allocation in the LPR. 2. Consequential amendments should be made to Core Policy CP2 (Strategic Growth and Development Locations) and to tables 3 and 5 of the LPR to reflect the deletion of Wisloe New Settlement. 	<p>All suggested policy wording modifications will be considered by the Inspectors at the EIP.</p>
Grass Roots Planning for:	<ul style="list-style-type: none"> ● Our previous concerns set out in our representations to the AHO consultation still remain, particularly the lack of a cumulative 	<p>The site has been modelled within the Traffic Forecasting Study (EB61). Ahead of the EIP, the Council is updating its transport evidence base and documentation. This will be published in due course.</p>



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
Clifton Homes (SW) Ltd (887)	assessments on transport impacts and how noise will seriously inhibit the delivery of housing and make future amenity issues unavoidable. The additional technical evidence to date has not alleviated our concerns with respect to viability, deliverability and some technical aspects of the scheme.	With suitable site layout and noise mitigation measures, suitable noise levels can be provided for residential accommodation. The Council's Viability Assessment (May 2021) (EB70) has modelled the site and the site performs better than all other strategic sites in the SDLP.
Redrow Homes (SW) Ltd (949)		
Redrow Homes (SW) Ltd (951)	<ul style="list-style-type: none"> The initial baseline landscape work which identifies the key corridors to be retained and remain free from development – this evidence base, coupled with the other work undertaken, sterilises a large proportion of the site and we question whether 1,500 dwellings can actually be delivered at an appropriate density in this location. If 1,500 dwellings cannot be achieved we fail to see what the site would act as a sustainable, standalone Garden Village proposal. 	The latest masterplan work demonstrates that 1,500 dwellings can be achieved.
Policy wording modifications: None		
Comment		
Network Rail (3)	<ul style="list-style-type: none"> There does not seem to be any information within the plan which informs that an assessment and provision for any required mitigation will be needed for the level crossings 	It is anticipated that the rail crossings will be closed for safety reasons. Further discussions between Network Rail, the promoters and the Council would be welcomed.
Policy wording modifications: None		
The Wildfowl & Wetlands Trust (WWT) (68)	<ul style="list-style-type: none"> With the information available, WWT has not seen any evidence to suggest that there would be significant damage to wetland species or habitats in relation to the proposed development of housing and other infrastructure at the Wisloe new settlement. However, we would expect to see a rigorous Environmental Impact Assessment undertaken as part of any specific planning application to identify any issues. We believe that 	Comment noted. The site would be subject to an Environmental Impact Assessment undertaken as part of any specific planning application. The development has been assessed as likely to result in significant biodiversity net gain, over the Government's intended minimum of 10%.



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
	through sensitive and appropriate design, the allocation could potentially deliver sustainable blue infrastructure with benefits for local biodiversity.	
Policy wording modifications: None		
Slimbridge Local History Society (86,331)	<ul style="list-style-type: none"> Slimbridge Local History Society believes the inclusion of PS37, Wisloe Green, in the proposed Local Plan is both unsound and not legally compliant for the following reasons: SDC failed to take any action to investigate additional information provided, from a number of sources, which would have cast the proposers' heritage sustainability assessment and the selection of PS37 in doubt. 	This is incorrect. The Council has considered a range of heritage evidence and other sustainability factors in assessing the site's suitability, compared with other sites.
	<ul style="list-style-type: none"> GCC Heritage Team has declined to geophysically scan the site until the planning application stage. This is in stark contrast to the alternative site at PGP1, Whitminster, where developers consider this an essential step in understanding the viability of the site to meet housing targets and avoid last minute surprises. 	The prospective developers at Whitminster are proposing to submit an application in advance of the SDLP (which does not contain their site) and therefore their strategy will be different.
	<ul style="list-style-type: none"> The proposers (there is no developer) cannot produce a masterplan without understanding the impact of the discovery of heritage assets would have on the layout of the site. It should be noted this is only one of a number of unknown factors SDC and the proposers have chosen to defer until later 	The promoters of Wisloe are providing a range of information appropriate for the Local Plan stage of site promotion.
	<ul style="list-style-type: none"> The actions of SDC with regard to heritage preservation is in direct contradiction of the NPPF 2019 requirements. This aspect of the plan is not legally compliant. 	The available historic environment records have been assessed by Cotswold Archaeology and Gloucestershire County Council and the conclusion at this Local Plan stage is that none of the assets are anticipated to be of such significance that they would preclude redevelopment. However, a programme of archaeological evaluation works would be undertaken at the planning application stage in accordance with the NPPF.



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
	Policy wording modifications: None	
Historic England (813)	<ul style="list-style-type: none"> The National Record of the Historic Environment (NRHE) includes reference to the site containing a variety of medieval, potentially Roman and Prehistoric archaeology. 	Comment noted. The available historic environment records have been assessed by Cotswold Archaeology and Gloucestershire County Council and the conclusion at this Local Plan stage is that none of the assets are anticipated to be of such significance that they would preclude redevelopment. However, a programme of archaeological evaluation works would be undertaken at the planning application stage in accordance with the NPPF.
	<ul style="list-style-type: none"> Suitable conditions should therefore be included in the body of the Plan to ensure these potentially nationally important features are appropriately considered, and their significance conserved in accordance with national policy and guidance. 	The Council and Historic England have signed a Statement of Common Ground (see Duty to cooperate Statement EB3) whereby the parties agree to work together through the examination process to resolve the outstanding matters by agreeing appropriate modifications to the Local Plan where necessary.
	Policy wording modifications: None	
McLoughlin Planning for Avant Homes (839)	<ul style="list-style-type: none"> Concern the evidence base is not as complete as for other sites 	The material available on the Examination Library relating to Wisloe is as comprehensive as any site.
McLoughlin Planning for Terra Strategic (848)	<ul style="list-style-type: none"> The site is not deliverable in the short term and will compete with Sharpness 	The site is deliverable within the timescales set out within the SDLP. There is no evidence that the site will compete with Sharpness.
McLoughlin Planning for SevenHomes (880)	<ul style="list-style-type: none"> Concern Carbon Neutral is not realistic 	The site has more potential than many sites for achieving sustainable forms of development and achieving modal shift.
	Policy wording modifications: None	
CPRE Gloucestershire (847)	<ul style="list-style-type: none"> The site is too near the Severn Estuary SAC/SPA/Ramsar site and Slimbridge WWT. 	The available evidence does not point to the site itself being important for biodiversity. However, residents from this development and others are likely to seek to access recreation opportunities at these sensitive sites. Therefore, the policy requires on site and, if appropriate, off site work to mitigate against the identified impacts of development upon the Severn Estuary SAC/SPA/Ramsar site.
	<ul style="list-style-type: none"> Previous Habitats Regulations Assessments (HRA) 	The available evidence does not point to the site itself being important for



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
	<p>have determined that the site is under severe pressure currently and it is important that Natural England is consulted to ensure that the requirements of the Conservation of Habitats and Species Regulations (2017) are fully met.</p>	<p>biodiversity. However, residents from this development and others are likely to seek to access recreation opportunities at these sensitive sites. Therefore, the policy requires on site and, if appropriate, off site work to mitigate against the identified impacts of development upon the Severn Estuary SAC/SPA/Ramsar site.</p>
	<ul style="list-style-type: none"> The site borders the River Cam, part of the Strategic Nature Area. Impact on this has not been assessed. 	<p>Only a small part of the site adjoins the River Cam and this part will remain part of the green infrastructure and wetlands/SUDS area. The development has been assessed as likely to result in significant biodiversity net gain, over the Government's intended minimum of 10%.</p>
	<ul style="list-style-type: none"> 84 Ha of primarily agricultural land' On the Natural England map this land shows as Grade 2 – Best and Most Versatile – and is incorrectly classified as Grade 3c in the submission. 	<p>The site has been resurveyed and now accurately graded. Whilst the site contains Grade 2 agricultural land, and poorer quality land should be preferred, this is rarely the deciding factor when considering all sustainability factors. In addition, there are various mitigation measures that can be used when land is proposed for development.</p>
	<ul style="list-style-type: none"> Reduce the 25% overprovision of housing in SDLP then this site is not needed. 	<p>The SDLP needs to include additional housing over the minimum required to ensure there is headroom and flexibility for the market.</p>
	Policy wording modifications: None	
Pegasus Group for Robert Hitchins Ltd (879)	<ul style="list-style-type: none"> Concerns are not so much the location, but the scale of the proposal and the ability of the site to deliver 1,500 dwellings in the plan period, particularly as there is no developer involved, the site is being promoted by the County Council and the Ernest Cook Trust. 	<p>The development of 1,500 dwellings over an 18-year period is reasonable and recent rates of building at Hunts Grove and Great Oldbury demonstrate that this level of development is achievable within Stroud District.</p>
	<ul style="list-style-type: none"> Given the likely housing trajectory is going to differ significantly from what is anticipated in the Plan, the proposal will not be able to achieve carbon neutral development by 2030 as set out in the first paragraph of Policy PS37. 	<p>The SDLP does not require PS37 to be completed by 2030. Development will have started and will be an exemplar for achieving carbon neutral development by 2030.</p>
	Policy wording modifications: None	
National Farmland Trust (919)	<ul style="list-style-type: none"> Site is Grade 2 agricultural land, no representation for food production in Local Plan. With the UK only producing around 50% of the food eaten in the UK, the loss of this productive farmland will have a 	<p>Whilst the site contains Grade 2 agricultural land, and poorer quality land should be preferred, this is rarely the deciding factor when considering all sustainability factors. In addition, there are various mitigation measures that can be used when land is proposed for development.</p>



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
	combined and continued effect on food production in the UK.	
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
86, 96, 365, 436, 446, 463, 480, 481, 483, 484, 633, 650, 805, 808, 816, 857, 924	<ul style="list-style-type: none"> New development is against carbon neutral commitment and will increase carbon emissions. 	All new development will result in the generation of carbon, however the policies in the SDLP are intended to result in developments being net zero, due to the increase in biodiversity net gain, sustainable construction standards and increased green infrastructure with any residual carbon subject to contribution to a carbon offset fund.
Strategic growth and development locations		
164, 192, 479, 646, 854, 856, 903	<ul style="list-style-type: none"> Too many houses for this part of the district. 	The development strategy seeks to locate development in the most sustainable locations.
11, 56, 63, 97, 116, 156, 164, 220, 259, 274, 309, 397, 398, 399, 400, 401, 418, 438, 446, 474, 483, 511, 633, 780, 816, 819, 838, 856, 858, 886, 893, 899, 903, 924, 943	<ul style="list-style-type: none"> Other sites not included in the plan are more sustainable. <ul style="list-style-type: none"> Dispersal approach, spreading the housing out to other areas preferred. Brownfield first. 	Topic Paper: The Development Strategy October 2021 (EB4) sets out the Council's approach to identifying and assessing potential spatial strategy options and how the development strategy was selected to meet requirements. Dispersing the minimum requirement of 12,600 homes amongst the District's villages is the least sustainable option. The SDLP supports the redevelopment of suitable brownfield land but there is insufficient brownfield land to meet all of the District's future needs.
7, 256, 276, 366, 478, 519, 700, 707, 737, 788	<ul style="list-style-type: none"> Sustainable location for new housing. <ul style="list-style-type: none"> Good access to existing services and infrastructure. 	Comment noted
Settlement hierarchy and place making		
70, 138, 158, 164, 192, 220, 235, 309, 349, 361, 397, 398, 399, 400, 401, 463, 468, 472, 483, 513,	<ul style="list-style-type: none"> Size and scale of development too large. 	The scale of development is of a size to allow for a range of services and facilities on-site to reduce the need for people to travel for their basic every day needs. The development will provide structural landscaping to prevent physical and visual coalescence with adjoining villages. The development will benefit adjoining communities by providing additional facilities and services



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
634, 646, 709, 721, 723, 789, 837, 854		and better access to the railway station at Cam.
767	<ul style="list-style-type: none"> Size and scale are right for the new development. 	Comment noted
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
281, 282, 283, 514	<ul style="list-style-type: none"> Existing community doesn't want this. 	The level of objections from local residents is acknowledged, however some in the area see the opportunities which the site can provide in terms of new school, community sports provision and shops.
19, 56, 63, 86, 97, 115, 139, 153, 156, 164, 220, 262, 273, 274, 279, 309, 325, 349, 384, 397, 398, 399, 400, 401, 441, 463, 465, 474, 480, 483, 591, 633, 634, 646, 650, 694, 745, 814, 816, 817, 819, 837, 845, 858, 886, 893, 899, 903, 918, 924, 940	<ul style="list-style-type: none"> Loss of individual communities' character and identity/coalescence. 	The development will provide structural landscaping to prevent physical and visual coalescence with adjoining villages. The development will benefit adjoining communities by providing additional facilities and services and better access to the railway station at Cam.
192, 349, 436, 774, 857	<ul style="list-style-type: none"> Won't be enough 'affordable homes'. 	The development will provide the 30% affordable housing identified by the Local Housing Needs Assessment (EB10) as required in the District.
Community facilities		
63, 97, 138, 153, 156, 164, 181, 235, 343, 431, 446, 463, 628, 633, 637, 646, 689, 745, 786, 809, 820,	<ul style="list-style-type: none"> Not enough school places. 	The policy requires a 3FE primary school (incorporating early years' provision) on a 2.8 ha site and contributions towards secondary school and further education provision.



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
845, 858, 886, 893, 903, 918		
138, 164, 181, 235, 274, 343, 387, 446, 637, 696, 701, 706, 819, 820, 845, 858, 886, 893, 918	<ul style="list-style-type: none"> Not enough doctors. 	The development will provide a doctor's surgery if required.
181,235, 446, 845	<ul style="list-style-type: none"> Not enough dentists. 	The development will provide a local centre which a dentist practice could locate to, subject to demand.
446, 816	<ul style="list-style-type: none"> No social care provisions. 	Policies CP7 and CP8 require major housing development to contribute to meeting identified long term needs in those communities the development relates to, including by providing sheltered housing (or Independent Living) and homes adapted to allow people to live at home for as long as possible.
9, 397, 398, 399, 400, 401, 633, 706, 816	<ul style="list-style-type: none"> No provision for new community centres, leisure facilities and new places of worship. 	The policy requires on-site community and sports built provision, contributions to off-site indoor sports and leisure facilities, a local centre, incorporating local retail, surgery and community uses (which could include a place of worship).
886, 893	<ul style="list-style-type: none"> Not enough sports facilities. 	The policy requires on-site community and sports built provision and contributions to off-site indoor sports and leisure facilities, in accordance with local standards.
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
19, 63, 96, 115, 155, 156, 164, 235, 263, 281, 282, 283, 410, 438, 468, 513, 514, 633, 646, 747, 805, 806, 814, 816, 858, 899, 918, 940, 943	<ul style="list-style-type: none"> Not enough new jobs locally: <ul style="list-style-type: none"> Increased need to travel. 	The policy requires the development to provide approximately 5 hectares of office, B2 and B8 employment land and ancillary employment uses, to reflect the identified sectoral needs of the District and local area. In addition, Cam and Dursley are located close to the site (access by walking, cycling and buses) which is an important area for local employment. For those who wish to access jobs further afield, the site adjoins Cam & Dursley rail station and buses which operate along the A38 transport corridor.
214	<ul style="list-style-type: none"> Question mark on deliverability and sustainability 	The site promoters can demonstrate that the site will be deliverable.



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
	with regard to employment provision.	Delivering a growth point necessitates the creation of a new pattern of employment provision. However, the site is close to the Cam employment market and has a good location on the A38.
Retail and town centres		
281, 282, 283, 514	<ul style="list-style-type: none"> Don't want more shops/ supermarkets. 	There is a lack of nearby shops for the villages of Slimbridge and Cambridge which the development will provide.
153, 164, 343, 349, 446, 463, 633, 701, 816, 899, 918	<ul style="list-style-type: none"> Not enough shops for the amount of proposed housing: <ul style="list-style-type: none"> Increasing reliance on car. 	There is a lack of nearby shops for the villages of Slimbridge and Cambridge which the development will provide. For larger shops the development will facilitate better access by public transport to shops and services in Cam and Dursley.
256	<ul style="list-style-type: none"> Good established retail links. 	Comment noted.
Travel, transport and highways		
11, 19, 63, 83, 96, 112, 115, 116, 124, 138, 153, 155, 156, 164, 235, 259, 263, 273, 274, 281, 282, 283, 309, 325, 343, 349, 365, 385, 397, 398, 399, 400, 401, 410, 418, 431, 438, 441, 446, 463, 465, 472, 474, 480, 481, 483, 484, 513, 514, 591, 611, 628, 632, 633, 634, 637, 646, 689, 706, 723, 747, 809, 814, 816, 819, 820, 837, 845, 846, 854, 856, 857, 858, 886, 893, 899, 902, 903, 918, 940	<ul style="list-style-type: none"> Current road network can't cope with traffic increases, in particular M5 Junctions 13 & 14 and A38. <ul style="list-style-type: none"> Inadequate cycling/ walking infrastructure. Lack of public transport. 	The site has been modelled within the Traffic Forecasting Study (EB61) which has identified only modest impacts on the local road network requiring mitigation. A number of sites will impact on M5 Junction 14, in addition to growth within South Gloucestershire and a funding and delivery strategy is being developed. The development provides the opportunity to improve strategic routes for walking and cycling and local access to Cam & Dursley rail station significantly. Ahead of the EIP, the Council is updating its transport evidence base and documentation. This will be published in due course.



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
56, 115, 124, 263, 273, 325, 365, 385, 431, 438, 441, 446, 463, 465, 468, 480, 483, 628, 689, 696, 816, 820, 854, 856, 858, 899, 902, 940	<ul style="list-style-type: none"> • Rail links at capacity: <ul style="list-style-type: none"> ○ Inadequate rail stations/ parking. 	The development provides the opportunity to improve local access to Cam & Dursley rail station significantly. The policy requires access improvements to Cam and Dursley station for sustainable modes and contributions towards the enhancement of passenger facilities. Car parking facilities at the station and along Box Road are improving the local provision.
256, 276, 366, 707, 734, 767	<ul style="list-style-type: none"> • Good Road and rail access. 	Comment noted.
235, 259, 483, 689, 696, 816, 851, 854, 903	<ul style="list-style-type: none"> • People won't/shouldn't have to use public transport. <ul style="list-style-type: none"> ○ It shouldn't be put forward as a sustainable or deliverable solution. 	The requirement of the planning system is to provide opportunities for people to use sustainable forms of transport. The site will deliver improvements to local sustainable forms of transport (walking and cycling, bus and rail).
527	<ul style="list-style-type: none"> • Mass transit solutions to reduce car ownership is no longer valid as Covid and future pandemic threat makes this unrealistic. 	The requirement of the planning system is to provide opportunities for people to use sustainable forms of transport. The site will deliver improvements to local sustainable forms of transport (walking and cycling, bus and rail).
423, 463	<ul style="list-style-type: none"> • Loss of public rights of way. 	Public rights of way will be incorporated into the proposed development.
Infrastructure		
256	<ul style="list-style-type: none"> • Good levels of existing infrastructure. 	Comment noted
19, 56, 63, 112, 115, 138, 153, 155, 156, 181, 214, 309, 385, 397, 398, 399, 400, 401, 410, 436, 463, 465, 474, 483, 591, 632, 650, 689, 786, 808, 809, 816, 826, 837, 845, 851, 856, 857, 860, 886, 893, 903, 924	<ul style="list-style-type: none"> • Gas pipeline can't be moved/ dangerous. <ul style="list-style-type: none"> ○ May stop site being developed 	<p>This constraint has been investigated by Wales & West Utilities and a preferred route option for its diversion in sympathy with the developers' concept has been recommended which stays largely within the noise buffer area and land owned by the developer.</p> <p>This constraint has been factored into the cost of delivering the development.</p>

Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
11, 94, 97, 121, 262, 410, 418, 446, 451, 463, 472, 474, 483, 513, 542, 637, 646, 701, 723, 747, 774, 805, 808, 816, 845, 886, 893, 902, 918	<ul style="list-style-type: none"> Too many houses not enough infrastructure. 	The Infrastructure Delivery Plan (EB69) has assessed the infrastructure requirements. There are no significant issues identified for this site that cannot be overcome.
56, 97, 153, 309, 397, 398, 399, 400, 401, 436, 446, 474, 480, 481, 483, 484, 646, 774, 805, 806, 845, 846, 857, 858, 893, 903	<ul style="list-style-type: none"> Inadequate sewage and waste water infrastructure. 	The Infrastructure Delivery Plan (EB69) has assessed the infrastructure requirements for sewerage and wastewater. There are no significant issues identified for this site that cannot be overcome.
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
11, 96, 112, 220, 235, 262, 281, 282, 283, 446, 484, 514, 637, 786, 808, 816, 817, 846, 858, 893, 903	<ul style="list-style-type: none"> Loss of greenfield/green belt. 	The SDLP supports the redevelopment of suitable brownfield land but there is insufficient brownfield land to meet all of the District's future needs. Greenfield development is required, but the site is expected to result in significant biodiversity net gain, over the Government's intended minimum of 10%, through green infrastructure planting.
11, 19, 56, 63, 96, 97, 112, 138, 181, 242, 259, 273, 274, 343, 385, 410, 431, 436, 461, 463, 465, 474, 480, 483, 513, 591, 611, 628, 633, 634, 650, 696, 786, 805, 806, 808, 814, 816, 817, 819, 837, 845,	<ul style="list-style-type: none"> Loss of agricultural land/land is Grade 2 not 3a/3b. 	The site has been resurveyed and now accurately graded. Whilst the site contains Grade 2 agricultural land, and poorer quality land should be preferred, this is rarely the deciding factor when considering all sustainability factors. In addition, there are various mitigation measures that can be used when land is proposed for development.



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
846, 851, 854, 856, 857, 858, 860, 893, 894, 899, 903, 918, 924, 940		
112, 115, 156, 235, 349, 481, 483, 484, 805, 808, 809, 820	<ul style="list-style-type: none"> Negative impact on the general environment. 	The site is of low landscape sensitivity and development will provide structural landscaping to prevent physical and visual coalescence with adjoining villages. The site is expected to result in significant biodiversity net gain, over the Government's intended minimum of 10%, through green infrastructure planting.
56, 63, 96, 97, 115, 138, 155, 156, 164, 181, 235, 259, 274, 315, 343, 349, 385, 410, 418, 446, 463, 465, 480, 542, 632, 633, 634, 650, 689, 805, 806, 808, 809, 814, 816, 819, 820, 845, 846, 851, 854, 856, 857, 867, 893, 899, 918, 924, 943	<ul style="list-style-type: none"> Surface water run off/flooding/river concerns/water pollution. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage. Only a small part of the site adjoins the River Cam and this part will remain part of the green infrastructure and wetlands/SUDS area. The development has been assessed as likely to result in significant biodiversity net gain, over the Government's intended minimum of 10%.
63, 82, 96, 112, 164, 220, 262, 274, 281, 283, 349, 385, 441, 446, 463, 465, 474, 480, 481, 484, 514, 542, 573, 591, 611, 633, 637, 650, 745, 774, 796, 805, 806, 808, 809, 814, 816, 817, 819, 820, 845, 846, 860, 903, 924, 943	<ul style="list-style-type: none"> Loss of biodiversity including green corridors, wildlife and habitats. <ul style="list-style-type: none"> Too close to Severn Estuary SAC/SPA/Ramsar site and Slimbridge WWT. 	The available evidence does not point to the site itself being important for biodiversity. The site is expected to result in significant biodiversity net gain, over the Government's intended minimum of 10%, through green infrastructure planting. However, residents from this development and others are likely to seek to access recreation opportunities at the Severn Estuary sensitive sites. Therefore, the policy requires on site and, if appropriate, off site work to mitigate against the identified impacts of development upon the Severn Estuary SAC/SPA/Ramsar site.



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
9, 11, 19, 63, 96, 115, 153, 155, 156, 181, 220, 274, 343, 385, 397, 398, 399, 400, 401, 436, 441, 446, 465, 474, 480, 481, 483, 484, 591, 633, 634, 650, 689, 805, 806, 809, 814, 816, 817, 820, 845, 846, 851, 856, 857, 860, 886, 893, 918, 924, 940, 943	<ul style="list-style-type: none"> Traffic noise and air pollution will increase/already at unacceptable decibel levels. 	Development will improve current levels of local traffic noise through the provision of acoustic bunding alongside the M5. Air quality is considered to be acceptable across the entire site except from a small strip adjacent to the M5. However, this should be subject to more detailed modelling which should accompany any planning application for development.
Landscape		
63, 115, 153, 262, 418, 436, 446, 465, 474, 481, 483, 484, 542, 611, 633, 696, 706, 786, 805, 806, 808, 816, 817, 819, 837, 857, 894, 918, 943	<ul style="list-style-type: none"> Negative impact on landscape including views of the Cotswolds AONB. 	The site is of low landscape sensitivity. Neither Natural England nor the AONB Board have objected to the allocation of the site.
Historic environment		
274, 650, 816, 858	<ul style="list-style-type: none"> Failed to assess the archaeological impact/needs further investigation due to known site of Roman significance. 	The available historic environment records have been assessed by Cotswold Archaeology and Gloucestershire County Council and the conclusion at this Local Plan stage is that none of the assets are anticipated to be of such significance that they would preclude redevelopment. However, a programme of archaeological evaluation works would be undertaken at the planning application stage in accordance with the NPPF.
164	<ul style="list-style-type: none"> Tourism will be impacted by loss of historic character. 	The site is of low landscape sensitivity. Neither Natural England nor the AONB Board have objected to the allocation of the site.
Policy wording modifications: None		
Delivery and Monitoring		



Site Reference: Strategic Site Allocation Policy PS37 Wisloe new settlement		
418, 480, 650	<ul style="list-style-type: none"> • Not deliverable in plan period. 	The development of 1,500 dwellings over an 18-year period is reasonable and recent rates of building at Hunts Grove and Great Oldbury demonstrate that this level of development is achievable within Stroud District.
63, 83, 274, 418, 474, 480, 816	<ul style="list-style-type: none"> • Too many houses. <ul style="list-style-type: none"> ○ Not enough market demand. 	The development of 1,500 dwellings over an 18-year period is reasonable and recent rates of building at Hunts Grove and Great Oldbury demonstrate that this level of development is achievable within Stroud District.
806	<ul style="list-style-type: none"> • A post-Covid review of housing demand should be undertaken before any further development is permitted. 	Government policy requires local authorities to continue to plan for the delivery of housing in accordance with the standard method for calculating housing requirements.
Policy wording modifications: None		



PS44

Site Reference: Local Sites Allocation Policy PS44 Northwest of Whitminster Lane, Frampton-on-Severn			
Number of representations: 35		Support: 8	Object: 25
Stakeholders		Comments	Stroud District Council Response
Support			
The Canal & River Trust (496)	<ul style="list-style-type: none"> Support subject to contribution towards improvement of the Gloucester & Sharpness canal towpath. 	Comment noted	
	Policy wording modifications: None		
SDC Cllr Haydn Jones (500)	<ul style="list-style-type: none"> Provides a valuable extension to the community of Frampton on Severn and an example of dispersed development, the favoured choice of development strategy expressed by residents at all phases of consultation. 	Comment noted	
	Policy wording modifications: None		
Far End Lake Lane Residents (822)	<ul style="list-style-type: none"> Opportunity to resolve longstanding existing surface water drainage and sewage system problems in Frampton, requiring investment in the infrastructure. 	Comment noted	
	<ul style="list-style-type: none"> An improved surface water drainage system will be required to resolve existing flash flooding of Lake Lane, accommodate additional drainage for the development and mitigate the loss of greenfield attenuation of storm water. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.	
	<ul style="list-style-type: none"> Sewage infrastructure should address existing problems as well as provide additional capacity for the new development. 	All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the Infrastructure Delivery Plan (EB69).	
	Policy wording modifications:		
	<ul style="list-style-type: none"> Suggested amended policy wording: <i>Particular issues to address include incorporating the existing Public Right of way into the development, the proximity of the site to the Gloucester and Sharpness Canal, existing inadequate surface water drainage & sewage systems and ensuring a high quality village edge to Frampton. A masterplan, to be</i> 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.	



Site Reference: Local Sites Allocation Policy PS44 Northwest of Whitminster Lane, Frampton-on-Severn		
	<i>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.</i>	
McLoughlin Planning for Seven Homes (880) Site promoter	<ul style="list-style-type: none"> The wider land parcel should be allocated to allow for comprehensive master planning including the provision of a landscaping and separation buffer and the resolution of the high voltage power lines and associated easements crossing the site. 	The Council considers the proposed allocation to be of appropriate scale and size for this Tier 3a settlement. Justification for the role of Frampton on Severn in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).
	<ul style="list-style-type: none"> The wider site can accommodate circa 80 dwellings. 	
	<ul style="list-style-type: none"> The public benefit of providing additional housing and demand for services and facilities in the village of Frampton on Severn offsets any heritage impact on the canal. 	
	<ul style="list-style-type: none"> Oatfield is not a historic settlement. A landscape buffer between the new dwellings and Oatfield can address concerns about the separation between Oatfield and Frampton. 	
	<ul style="list-style-type: none"> The current allocation site is rated red in the Sustainability Appraisal (SA) for the efficient use of land. 	Sites that are on greenfield land classed as high quality agricultural land (Grades 1, 2 or 3a) are rated red, as having a significant negative (--) effect, for efficiency in land use and protection of soil quality regardless of size. Sites are allocated having regard to Sustainability Appraisal across 17 SA objectives; this is a balanced judgement taking all objectives into consideration.
	<ul style="list-style-type: none"> Main access to the site should be from Whitminster Lane with pedestrian and cycle access via Oatfield Road to link with the public footpath which crosses the site. 	Supporting text para 3.6.6 states access from Oatfield Road.
	Policy wording modifications:	
<ul style="list-style-type: none"> An increase in the allocation to 'circa 80 dwellings'. 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.	
<ul style="list-style-type: none"> An increase in the site allocation as per the Vision Document. 		
<ul style="list-style-type: none"> Access via Whitminster Lane. 		



Site Reference: Local Sites Allocation Policy PS44 Northwest of Whitminster Lane, Frampton-on-Severn		
Object		
Frampton on Severn Parish Council (429)	<ul style="list-style-type: none"> The site is outside the current settlement boundary. 	Comment noted
	<ul style="list-style-type: none"> Development is contrary to the adopted Community Design Statement which identifies an alternative brownfield site, The Old Dairy, off Whitminster Lane, for housing. 	The Council considers Local Site Allocation PS44 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
	<ul style="list-style-type: none"> The site is a designated open space in the Community Design Statement, Oatfield (4). 	
	<ul style="list-style-type: none"> The site provides vital flood attenuation for the village and is subject to the most frequent flooding following heavy rainfall. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
	<ul style="list-style-type: none"> Unsuitable access with significant safety hazards for children using the childrens' play area. 	On-site specifics, including detailed site access proposals and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.
	<ul style="list-style-type: none"> Potential health risk from overhead power lines. 	All sites have been assessed with the statutory bodies, National Grid and Western Power Distribution. Any mitigation required is included in the IDP.
	<ul style="list-style-type: none"> Impact on well used public footpath crossing the site. 	On-site specifics, including incorporating the existing Public Right of Way, to be addressed at the masterplan/ planning application stage in agreement with Gloucestershire Highways.
	<ul style="list-style-type: none"> In the light of global warming, residential development should not be considered where there is clear historical evidence of frequent flooding. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
	<ul style="list-style-type: none"> Suggested improvements: <ul style="list-style-type: none"> Move access away from Oatfield Road Bury overhead power lines Provide a robust storm water attenuation system including balancing ponds and underground storm water storage tanks and porous hard standings. Increase capacity in the current drainage infrastructure to eliminate current issues and mitigate the effects of the new development. Ensure a public footpath is maintained across the area. 	Comments noted



Site Reference: Local Sites Allocation Policy PS44 Northwest of Whitminster Lane, Frampton-on-Severn		
	Policy wording modifications: None	
Whitminster Parish Council (659)	<ul style="list-style-type: none"> There are better located alternative sites for the number of new houses for the village that the Parish considers sustainable. 	The Council considers Local Site Allocation PS44 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
	Policy wording modifications: None	
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> No significant initial concerns subject to a full ecological appraisal 	Comment noted
	<ul style="list-style-type: none"> The development should be required to make a proportional contribution to the creation of SANGs to mitigate additional recreational pressure on the Severn Estuary SAC, SPA, RAMSAR and land functionally linked to it. 	The site is located within the Severn Estuary SAC, SPA and Ramsar core catchment zone. Development proposals within this core catchment zone will be required to contribute to mitigation measures, in accordance with the agreed SAC Avoidance and Mitigation Strategy, in order to avoid an adverse effect on the integrity of the SAC associated with increased recreational activity over the plan period
	<ul style="list-style-type: none"> Green Infrastructure should be steered towards open and wetland habitat creation in accordance with Nature Recovery Network (NRN) objectives for the wider open and wetland habitat low priority area. 	On-site specifics; including strategic landscaping in association with the Public Right of Way, enhancement of the Gloucester and Sharpness Canal and village edge, to be addressed at the masterplan/ planning application stage.
	Policy wording modifications: None	
CPRE Gloucestershire (847)	<ul style="list-style-type: none"> Greenfield site constrained by major power lines. Suggest Oatfield Farm Barns as a potential alternative brownfield site. 	The Council considers Local Site Allocation PS44 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
	Policy wording modifications: None	
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
10, 732, 775, 594	<ul style="list-style-type: none"> The development fails to address the challenges of climate change and will be susceptible to surface water flooding and tidal flooding. 	New Core Policy DCP1 Delivering Carbon Neutral by 2030 sets out the overarching requirements for all new development, to support the Council's target to become Carbon Neutral by 2030. All sites have been assessed in



Site Reference: Local Sites Allocation Policy PS44 Northwest of Whitminster Lane, Frampton-on-Severn		
		the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
Strategic growth and development locations		
358	<ul style="list-style-type: none"> Support site location close to an existing travel corridor with ease of access to county council growth and employment areas 	Comment noted
192	<ul style="list-style-type: none"> Too many houses and won't deliver the amount of 'affordable homes' promised. 	Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 4 or more dwellings in designated rural areas, including Whitminster CP. Topic Paper: Housing needs and supply (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
188	<ul style="list-style-type: none"> Additional homes unnecessary until existing commitments with planning permission have been developed. 	Section 2.5 Housing, Table 2 Calculating our residual housing requirement to 2040 sets out the component elements of housing supply against objectively assessed housing needs and a minimum residual housing requirement of 8,005 dwellings. Topic Paper: Housing needs and supply (EB8) evidences the Council's approach to identifying and assessing housing needs and calculating the minimum residual housing requirement taking into account existing commitments with planning permission.
594, 775, 894, 732	<ul style="list-style-type: none"> Development of this greenfield site is contrary to Parish Council comments and to the adopted Community Design Statement. Other brownfield sites have been identified which could accommodate a similar need of housing. Specific sites mentioned: Oatfield Farm Barns (894), The Old Dairy (732) 	The Council considers Local Site Allocation PS44 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
775	<ul style="list-style-type: none"> The site and reasonable alternatives have not been assessed consistently in terms of the potential impacts on the rural and historic setting of the canal. 	The Council considers Local Site Allocation PS44 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
775, 488, 594	<ul style="list-style-type: none"> The site is being promoted for 60 -80 homes. 	Comment noted



Site Reference: Local Sites Allocation Policy PS44 Northwest of Whitminster Lane, Frampton-on-Severn		
775	<ul style="list-style-type: none"> Significant concerns that the current Stroud District Local Plan has downplayed the size of the development in order to be seen as a minor development so to circumvent the normal rigour of a larger scale development (for instance completing a sequential test for local circumstances). 	The Council considers the proposed allocation to be of appropriate scale and size for this Tier 3a settlement.
Settlement hierarchy and place making		
Rep no(s)		
Infrastructure and developer contributions		
Rep no(s)		
Policy wording modifications: None		
Homes and Communities		
Housing		
488	<ul style="list-style-type: none"> If permitted, any development should be restricted to meeting any identified local housing need only. 	Topic Paper: Housing needs and supply October 2021 (EB8) sets out local housing need.
Community facilities		
77, 188, 683, 470	<ul style="list-style-type: none"> Insufficient (primary) school capacity. Lakefield Primary School and Whitminster Primary School at capacity with limited scope to improve the buildings. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
188	<ul style="list-style-type: none"> Secondary school catchment areas have changed seeing many Frampton pupils not gain entry to their first-choice secondary school and dramatically increasing bus-fares. 	
188	<ul style="list-style-type: none"> Pre-school – limited options and places scarce. 	
188, 683	<ul style="list-style-type: none"> Additional pressure on existing pressurised GP service. 	
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
Rep no(s)		
Retail and town centres		
Rep no(s)		



Site Reference: Local Sites Allocation Policy PS44 Northwest of Whitminster Lane, Frampton-on-Severn		
Travel, transport and highways		
14, 77, 188, 683, 470, 671, 732	<ul style="list-style-type: none"> Unsafe access through Oatfield Road, next to the village play area and primary school. 	On-site specifics, including detailed site access proposals and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.
188, 488, 470, 602	<ul style="list-style-type: none"> Unsafe/ unsuitable alternative access from Whitminster Lane due to double bend, proximity to the doctors surgery exit and additional traffic on designated cycle route and wider road network. 	
671	<ul style="list-style-type: none"> Impact on access, parking and safety for existing residents/ users of Oatfield Road & Phillimore Gardens. 	
14	<ul style="list-style-type: none"> Insufficient public transport links to sustain a larger population in this area. 	Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities. Development will deliver a high quality and accessible PROW linking Oatfield Road and Whitminster Lane enhancing the existing walking and cycling network.
671	<ul style="list-style-type: none"> Concerns about the retention of the public footpath through the site. 	On-site specifics, including incorporating the existing Public Right of Way, to be addressed at the masterplan/ planning application stage in agreement with Gloucestershire Highways.
Infrastructure		
14, 188, 683, 59, 775, 470, 602	<ul style="list-style-type: none"> Increased pressure on existing inadequate surface water and waste water infrastructure. 	All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP.
775, 188, 894, 59, 602	<ul style="list-style-type: none"> Concerns around the high voltage overhead power lines, disruption to existing residents and impact on health. 	All sites have been assessed with the statutory bodies, National Grid and Western Power Distribution. Any mitigation required is included in the IDP.
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
671, 14, 188, 488, 798, 59, 15, 470	<ul style="list-style-type: none"> Development of this greenfield site will result in increased surface water flash flood risk for the playing field, school and houses in Lake Lane and Whitminster Lane, which already have existing flood 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.



Site Reference: Local Sites Allocation Policy PS44 Northwest of Whitminster Lane, Frampton-on-Severn		
	issue problems.	
709	<ul style="list-style-type: none"> Do not allow any hard non porous standing, parking areas for vehicles, including private drives. 	Comment noted
488, 798	<ul style="list-style-type: none"> Loss of hedgerows and wildlife habitats, known for bats. 	<p>The Council will comply with its duty under the Conservation of Species and Habitats regulations (2017). Delivery Policy ES6 requires the provision of a minimum of 10% net gain in biodiversity through enhancement and creation of ecological network.</p> <p>Delivery Policy ES8 requires no net loss of hedgerows as they form a key component of local ecological networks and ecosystem services.</p>
Landscape		
775, 188, 488, 594	<ul style="list-style-type: none"> The site is identified and designated as an important open space in the adopted Community Design Statement. 	The Council considers Local Site Allocation PS44 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
59	<ul style="list-style-type: none"> Loss of a valuable amenity space. 	The site is an agricultural field crossed by a Public Right of Way. On-site specifics, including incorporating the existing Public Right of Way, to be addressed at the masterplan/ planning application stage in agreement with Gloucestershire Highways.
798, 488, 10, 59, 894	<ul style="list-style-type: none"> Impact on the separation and identity of Frampton and Oatfield as distinct settlements. 	The Council considers the proposed allocation to be of appropriate scale and size to maintain the separation and identity of Frampton and Oatfield as distinct settlements.
Historic environment		
Rep no(s)		
Policy wording modifications: None		
Delivery and Monitoring		
Rep no(s)		
Policy wording modifications: None		



PS45

Site Reference: Local Sites Allocation Policy PS45 Land west of Upton's Gardens, Whitminster				
Number of representations: 16		Support: 8	Object: 7	Comment: 1
Stakeholders	Comments		Stroud District Council Response	
Support				
Sport England (133)	<ul style="list-style-type: none"> Highlight potential impact on residential amenity from ball strike from the adjacent playing fields. 		Comment noted	
Policy wording modifications: None				
SDC Cllr Haydn Jones (500)	<ul style="list-style-type: none"> Provides a valuable extension to the community of Whitminster and an example of dispersed development, the favoured choice of development strategy expressed by residents at all phases of consultation. Support policy requirements to minimise impacts on the landscape and setting of historical assets. 		Comments noted	
Policy wording modifications: None				
Whitminster Parish Council (659)	<ul style="list-style-type: none"> The site represents natural and appropriate infill without any wider visual impact on the village or the settlement boundary. 		Comment noted	
	<ul style="list-style-type: none"> Consider the site suitable for up to 10 dwellings. 		Comment noted	
Policy wording modifications: None				
Origin3 for Newland Homes and Swan Hill Homes (868) Site promoter	<ul style="list-style-type: none"> Small scale, deliverable housing development without overriding infrastructure requirements and an opportunity to enhance the sustainability of a smaller settlement through organic growth. 		Comment noted	
	<ul style="list-style-type: none"> The site has capacity for 11 dwellings, open space uses and landscaping respecting nearby heritage assets and their setting. 		Comment noted	
	<ul style="list-style-type: none"> The policy requirement for a masterplan is contested as overly onerous given the scale of the proposed development/ site. 		The Council considers that the indicative masterplan approach will ensure that development addresses the site allocation policy requirements for high quality sustainable development in this location in an integrated and co-ordinated manner.	
	<ul style="list-style-type: none"> Highlight 0.9ha site area and contribution to 10% of 		Comment noted	



Site Reference: Local Sites Allocation Policy PS45 Land west of Upton's Gardens, Whitminster		
	housing requirement on sites no larger than 1ha.	
	Policy wording modifications:	
	<ul style="list-style-type: none"> Amend policy wording to state: <i>“Land south of Whitminster Playing Field, as identified on the policies map is allocated for a development comprising around 10 dwellings and open space uses and strategic landscaping. Particular issues to address include conserving and enhancing heritage assets through high quality design, retaining the western half of the site in open space uses, minimising landscape impacts and safeguarding and enhancing local biodiversity. A masterplan to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and coordinated manner.”</i> 	All suggested policy wording modifications will be considered by the Inspectors at the EIP.
Object		
No comments received	Policy wording modifications: None	
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> The site may contain areas of priority habitat so a full ecological appraisal should be undertaken before a decision is taken on its development suitability. 	<p>The Council considers Local Site Allocation PS45 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>On-site specifics; including safeguarding and enhancing local biodiversity, to be addressed at the masterplan/ planning application stage.</p>
	<ul style="list-style-type: none"> The development should be required to make a proportional contribution to the creation of SANGs to mitigate additional recreational pressure on the Severn Estuary SAC, SPA, RAMSAR and land functionally linked to it. 	The site is located within the Severn Estuary SAC, SPA and Ramsar core catchment zone. Development proposals within this core catchment zone will be required to contribute to mitigation measures, in accordance with the agreed SAC Avoidance and Mitigation Strategy, in order to avoid an adverse effect on the integrity of the SAC associated with increased recreational activity over the plan period
	<ul style="list-style-type: none"> Green Infrastructure should be steered towards open 	On-site specifics, including safeguarding and enhancing local biodiversity, to



Site Reference: Local Sites Allocation Policy PS45 Land west of Upton's Gardens, Whitminster		
	and wetland habitat creation in accordance with Nature Recovery Network (NRN) objectives for wider open and wetland habitat medium priority area.	be addressed at the masterplan/ planning application stage.
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		
358	<ul style="list-style-type: none"> Support site location close to an existing travel corridor with ease of access to county council growth and employment areas 	Comment noted
192	<ul style="list-style-type: none"> Too many houses and won't deliver the amount of 'affordable homes' promised. 	Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 4 or more dwellings in designated rural areas, including Whitminster CP. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
Settlement hierarchy and place making		
No comments received		
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
No comments received		



Site Reference: Local Sites Allocation Policy PS45 Land west of Upton's Gardens, Whitminster		
Community facilities		
59	<ul style="list-style-type: none"> Whitminster Primary School at capacity 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
No comments received		
Retail and town centres		
No comments received		
Travel, transport and highways		
14	<ul style="list-style-type: none"> Insufficient public transport links to sustain a larger population in this area. 	Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.
Infrastructure		
14, 59, 671	<ul style="list-style-type: none"> Increased pressure on existing inadequate waste water infrastructure in Whitminster and downstream in Frampton on Severn. 	All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP (EB69).
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
671	<ul style="list-style-type: none"> More building in local area will increase the flood impact on Frampton on Severn and other downstream settlements. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
709	<ul style="list-style-type: none"> Do not allow any hard non porous standing, parking areas for vehicles, including private drives. 	Comment noted
Landscape		
No comments received		
Historic environment		



Site Reference: Local Sites Allocation Policy PS45 Land west of Upton's Gardens, Whitminster		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		



PS46

Site Reference: Local Sites Allocation Policy PS46 Land west of School Lane, Whitminster				
Number of representations: 21		Support: 8	Object: 10	Comment: 3
Stakeholders	Comments		Stroud District Council Response	
Support				
Sport England (133)	<ul style="list-style-type: none"> Highlight potential impact on residential amenity from ball strike from the adjacent playing fields. 		Comment noted	
Policy wording modifications: None				
SDC Cllr Haydn Jones (500)	<ul style="list-style-type: none"> Provides a valuable extension to the community of Whitminster and an example of dispersed development, the favoured choice of development strategy expressed by residents at all phases of consultation. Support policy requirements to minimise landscape impact. 		Comments noted	
Policy wording modifications: None				
Whitminster Parish Council (659)	<ul style="list-style-type: none"> Support the allocation of the site for residential development not exceeding 30 dwellings and a combined total for Whitminster of 40 dwellings across both Local Sites Allocations, PS45 and PS46, identified at Whitminster. 		The Council considers the proposed allocation to be of appropriate scale and size for this Tier 3a settlement. Justification for the role of Whitminster in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).	
Policy wording modifications: None				
Pegasus Group for Robert Hitchins Ltd (879) Site promoter	<ul style="list-style-type: none"> Support the allocation of the site for up to 60 dwellings (Appendix 1 - Scheme B). Support the allocation of the wider land parcel, to include land to the north west, for 100 dwellings (Appendix 1 - Scheme A). Policy PS46 should be modified to make the most efficient use of the site in accordance with the NPPF Section 11 Making Effective Use of Land and increase the number of dwellings to up to 100. This will support the role and function of Whitminster as a Tier 3a settlement. 		The Council considers the proposed allocation to be of appropriate scale and size for this Tier 3a settlement. Justification for the role of Whitminster in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).	
Policy wording modifications: None				



Site Reference: Local Sites Allocation Policy PS46 Land west of School Lane, Whitminster		
Object		
No comments received		
Policy wording modifications: None		
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> No significant initial concerns subject to a full ecological appraisal 	Comment noted
	<ul style="list-style-type: none"> The development should be required to make a proportional contribution to the creation of SANGs to mitigate additional recreational pressure on the Severn Estuary SAC, SPA, RAMSAR and land functionally linked to it. 	The site is located within the Severn Estuary SAC, SPA and Ramsar core catchment zone. Development proposals within this core catchment zone will be required to contribute to mitigation measures, in accordance with the agreed SAC Avoidance and Mitigation Strategy, in order to avoid an adverse effect on the integrity of the SAC associated with increased recreational activity over the plan period
	<ul style="list-style-type: none"> Green Infrastructure should be steered towards open and wetland habitat creation in accordance with Nature Recovery Network (NRN) objectives for the wider open and wetland habitat low priority area. 	On-site specifics; including strategic landscaping, in association with the Public Right of Way and minimising landscape impacts, to be addressed at the masterplan/ planning application stage.
	Policy wording modifications: None	
CPRE Gloucestershire (847)	<ul style="list-style-type: none"> Great care and site planting will be needed to protect the view of this site from the Industrial Heritage Conservation Area (IHCA). 	On-site specifics; including strategic landscaping, in association with the Public Right of Way and minimising landscape impacts, to be addressed at the masterplan/ planning application stage.
	Policy wording modifications: None	
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		
358	<ul style="list-style-type: none"> Support site location close to an existing travel corridor with ease of access to county council growth and employment areas 	Comment noted
192	<ul style="list-style-type: none"> Too many houses and won't deliver the amount of 	Core Policy CP9 Affordable housing sets out a requirement to provide at



Site Reference: Local Sites Allocation Policy PS46 Land west of School Lane, Whitminster		
	'affordable homes' promised.	least 30% affordable housing on sites capable of providing 4 or more dwellings in designated rural areas, including Whitminster CP. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
Settlement hierarchy and place making		
No comments received		
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
No comments received		
Community facilities		
No comments received		
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
No comments received		
Retail and town centres		
No comments received		
Travel, transport and highways		
14	<ul style="list-style-type: none"> Insufficient public transport links to sustain a larger population in this area. 	Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60), for delivering sustainable transport choices, prioritising active travel measures and



Site Reference: Local Sites Allocation Policy PS46 Land west of School Lane, Whitminster		
		<p>improvement of public transport opportunities.</p> <p>Development will deliver enhancements to the existing Public Right of Way to School Lane as a high quality and accessible route linked with the existing walking and cycling network.</p>
Infrastructure		
14, 59, 671	<ul style="list-style-type: none"> Increased pressure on existing inadequate waste water infrastructure in Whitminster and downstream in Frampton on Severn. 	All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP.
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
26	<ul style="list-style-type: none"> This would be the ruination of a site of natural beauty and interest. 	<p>The Council considers Local Site Allocation PS46 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>On-site specifics; including strategic landscaping and robust tree planting, to be addressed at the masterplan/ planning application stage.</p>
671	<ul style="list-style-type: none"> More building in local area will increase the flood impact on Frampton on Severn and other downstream settlements. 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
709	<ul style="list-style-type: none"> Do not allow any hard non porous standing, parking areas for vehicles, including private drives. 	Comment noted
Landscape		
894	<ul style="list-style-type: none"> Plant more hedges along the North West side as well as the South side overlooking the IHCA. 	On-site specifics, including strategic landscaping to minimise landscape impacts and integrating the Public Right of Way within landscaped open space, to be addressed at the masterplan/ planning application stage.
Historic environment		
894	<ul style="list-style-type: none"> Great care and site planting will be needed to protect the view of this site from the Industrial 	On-site specifics, including strategic landscaping to minimise landscape impacts and integrating the Public Right of Way within landscaped open



Site Reference: Local Sites Allocation Policy PS46 Land west of School Lane, Whitminster		
	Heritage Conservation Area (IHCA)	space, to be addressed at the masterplan/ planning application stage.
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		





Site Reference: Local Sites Allocation Policy PS38 South of Wickwar Road, Kingswood			
Number of representations: 16		Support: 3	Object: 9
Stakeholders		Comments	Stroud District Council Response
Support			
Blue Fox Planning Ltd for Persimmon Homes Severn Valley PHSV (928) Site promoters	<ul style="list-style-type: none"> Support allocation to sustain and enhance Kingswood’s role as an ‘Accessible Settlement’ with local facilities. 	Comments noted	
	<ul style="list-style-type: none"> PHSV control all the land to deliver the full allocation including the creation of safe and convenient vehicular access. 		
	<ul style="list-style-type: none"> Will contribute to the short term housing land supply, including the provision of 30% affordable housing. 		
	<ul style="list-style-type: none"> The Sustainability Appraisal (SA) demonstrates that PS38 is a sustainable development option. 		
	<ul style="list-style-type: none"> The site is an appropriate greenfield site in accordance with the wider development strategy. 		
	<ul style="list-style-type: none"> Disagree with SA Objective 12 (Flooding) – minor negative effect: A Flood Risk Assessment has been provided which confirms a surface water drainage strategy to discharge development flows into a new sewer located on an adjacent field connecting with the existing network. Foul drainage flows will be collected in an on-site adoptable sewer network and discharged into an existing adopted foul sewer. 		
	<ul style="list-style-type: none"> Reference to ‘strategic landscape’ is unnecessary. Landscaping provision should be in accordance with the criteria set out in policy ES7 for the retention and management of natural features such as trees and hedgerows that continue to the landscape character and setting of the development. 		Strategic landscaping is a necessary and justified requirement to integrate the development into the landscape, identified in the policy wording as a particular issue to address.
<ul style="list-style-type: none"> The policy wording, for development to retain and enhance existing trees and hedgerows, is too 	Supporting paragraph 3.7.6 sets out the wider aims for development to retain and enhance existing trees and hedgerows to support local		



Site Reference: Local Sites Allocation Policy PS38 South of Wickwar Road, Kingswood		
	<p>prescriptive. The policy should be revised in accordance with ES8 which recognises that in some cases the loss of existing features may be acceptable subject to adequate replacement provision and enhancement.</p>	<p>biodiversity and integrate the development into the landscape setting, identified as particular issues to address in the policy wording.</p>
	<ul style="list-style-type: none"> The quantum of development should allow for “a minimum of 50 dwellings to provide sufficient flexibility in the quantitative requirements of individual allocations and add resilience to overall housing delivery particularly where the overarching delivery strategy places a significant reliance on a new settlements to contribute to housing delivery over the plan period. 	<p>The Council considers the proposed allocation to be of appropriate scale and size for this Tier 3a settlement. Justification for the role of Kingswood in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9)</p>
	<ul style="list-style-type: none"> PS38 is a relatively modest allocation and the requirement for a Masterplan to be approved outside of the planning application process would be both disproportionate and unjustified. 	<p>The Council considers that the indicative masterplan approach will ensure that development addresses the site allocation policy requirements for high quality sustainable development in this location in an integrated and co-ordinated manner.</p>
Policy wording modifications: None		
Object		
Ridge and Partners LLP for Bloor Homes Western (911)	<ul style="list-style-type: none"> SALA site capacity identified as only able to accommodate between 35 – 45 dwellings. 	<p>The Council considers the proposed allocation to be of appropriate capacity and in accordance with SALA site assessments for the combined site KIN005 and KIN011.</p>
	<ul style="list-style-type: none"> Alternative site PS39 South of Walk Mill Lane, Kingswood is identified in the SALA as a deliverable site with future potential to accommodate 50 dwellings in accordance with the identified housing target for Kingswood of 50 dwellings set out in CP2. 	<p>Comment noted</p>
	<ul style="list-style-type: none"> PS39 South of Walk Mill Lane performs more strongly overall than PS38 South of Wickwar Road in the Sustainability Appraisal (SA) by achieving biodiversity net gains, less landscape impact and the more efficient use of land noting part of the site is brownfield land. 	<p>The SALA identified that the site may have some development potential subject to resolving specific constraints and impacts. SA Appendix 9 (CD3b) sets out the audit trail of site options: The site was included in the Emerging Strategy as one of two potential alternative sites at Kingswood to meet local needs. Having considered the scale of growth appropriate for a Tier 3a settlement set out in the Draft Strategy and the benefits and disbenefits of</p>

Site Reference: Local Sites Allocation Policy PS38 South of Wickwar Road, Kingswood		
	<ul style="list-style-type: none"> PS38 is located more than the 2-mile limit from the closest primary school in Wotton with capacity and ability to expand identified by the Department of Transport 2014 as the appropriate walking distance for children to walk to (primary) school. PS39 is a more suitable and sustainable location for residential development within the Wotton Cluster due to its location within 2 miles limit of a primary school in Wotton and the identified opportunities to deliver improved pedestrian and cycle accessibility and safety between the site and Blue Coat School, Wotton and the provision of a sports pitch on site for use by Kingswood Primary School, enhancing the level of services and facilities within the village. 	<p>this site in comparison with alternative sites at this settlement, it was proposed to allocate site PS38.</p> <p>Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p>
	Policy wording modifications: None	
Kingswood Parish Council (956)	<ul style="list-style-type: none"> The policy proposes very low density development and is not considered an effective use of land. 	The Council considers the proposed allocation to be of appropriate capacity and in accordance with SALA site assessments for the combined site KIN005 and KIN011.
	<ul style="list-style-type: none"> Local schools are at capacity and cannot accommodate the level of growth earmarked for the site. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> The policy offers no resolution to the education capacity issues, nor does it provide sustainable travel solutions for school children. 	The County Council has indicated that there is existing capacity at local schools within Wotton. 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.
	<ul style="list-style-type: none"> Kingswood lacks other essential infrastructure such as healthcare and cultural facilities which are critical in ensuring that future needs are met. 	The Council considers the proposed allocation to be of appropriate scale and size for this Tier 3a settlement. Justification for the role of Kingswood in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 and the Topic Paper: Assessment and



Site Reference: Local Sites Allocation Policy PS38 South of Wickwar Road, Kingswood		
		selection of sites October 2021.
	<ul style="list-style-type: none"> Policy PS38 (South of Wickwar Road) would cause significant pressures on the local road network, particularly Wickwar Road with no plans to mitigate these issues. 	<p>Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>On-site specifics, including highway safety improvements to access services within the village, to be addressed at the masterplan/ planning application stage to deliver on and off-site safer and accessible pedestrian cycle routes to key destinations.</p>
	<ul style="list-style-type: none"> Kingswood straddles two separate housing market areas and therefore it is unclear as to whether the Local Plan presents accurate housing need figures for Kingswood. 	Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council’s approach to identifying and assessing housing needs.
	<ul style="list-style-type: none"> The local housing need figure for Kingswood has already been met through existing incomplete commitments in Wotton-under-Edge. There is no need to develop in Kingswood as Stroud has 6.56 years of housing supply. 	<p>Section 2.5 Housing, Table 2 Calculating our residual housing requirement to 2040 sets out the component elements of housing supply against objectively assessed housing needs and a minimum residual housing requirement of 8,005 dwellings.</p> <p>Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council’s approach to identifying and assessing housing needs and calculating the minimum residual housing requirement taking into account existing commitments with planning permission.</p>
	<ul style="list-style-type: none"> The impacts of Covid-19 have not been addressed within the Local Plan – this is particularly evident in the housing chapters where changing lifestyles have not been factored into local housing need projections. 	A written ministerial statement was released on 19 January 2021 (AD2) which set out the importance of work continuing to advance Local Plans through to adoption by the end of 2023 to help ensure that the economy can rebound strongly from the COVID-19 pandemic.
Policy wording modifications: None		
Comment		
Gloucestershire	<ul style="list-style-type: none"> GWT is neutral on this allocation. 	Comment noted



Site Reference: Local Sites Allocation Policy PS38 South of Wickwar Road, Kingswood		
Wildlife Trust (202)	<ul style="list-style-type: none"> There are multiple records of protected and priority species within and near to this allocation, which appears to be a regularly used bat foraging habitat and a full ecological appraisal should be undertaken before a decision is taken on its development suitability and design. 	<p>The Council considers Local Site Allocation PS38 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>On-site specifics; including conserving and enhancing local biodiversity, to be addressed at the masterplan/ planning application stage.</p>
Policy wording modifications: None		
CPRE Gloucestershire (847)	<ul style="list-style-type: none"> Kingswood Primary School is at capacity and has no space to expand. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
	<ul style="list-style-type: none"> Primary Schools in Wotton are at capacity. 	
	<ul style="list-style-type: none"> There is no evidence of cooperation with South Gloucestershire Council over significant new and planned development between Charfield, Wickwar and Kingswood. 	The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan.
	<ul style="list-style-type: none"> Increased through traffic in Kingswood and surrounding lanes. 	<p>Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>On-site specifics, including highway safety improvements to access services within the village, to be addressed at the masterplan/ planning application stage to deliver on and off-site safer and accessible pedestrian cycle routes to key destinations.</p>
Policy wording modifications: None		
Pegasus Group for Quinque Stella Holdings Ltd (889)	<ul style="list-style-type: none"> There is a clear need for housing to come forward at Kingswood and site allocations should be identified accordingly. 	Comment noted
	<ul style="list-style-type: none"> The former Orchestra Works site (ER10) does not need to be retained for employment uses 	Delivery Policy EI2 identifies ER10 Orchestra Works, Kingswood as an existing employment site suitable for regeneration through mixed-use development, including employment generating uses and housing.
	<ul style="list-style-type: none"> The regeneration of the brownfield Orchestra Works site for high quality housing development is sequentially preferable to the proposed allocation PS38 South of Wickwar Road. 	



Site Reference: Local Sites Allocation Policy PS38 South of Wickwar Road, Kingswood		
	<ul style="list-style-type: none"> The former Orchestra Works site is capable of accommodating around 20 – 25 dwellings either instead of or alongside PS38 South of Wickwar Road. 	
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		
13	<ul style="list-style-type: none"> Kingswood has taken a disproportionate amount of growth through unplanned developments in recent years. Schools in Wotton have sufficient capacity and additional sustainable housing should be located in Wotton as a 2nd tier settlement. 	The Council considers the proposed allocation to be of appropriate scale and size for this Tier 3a settlement. Justification for the role of Kingswood in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019)(EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).
192, 405	<ul style="list-style-type: none"> Too many houses and won't deliver the amount of 'affordable homes' promised. 	Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 4 or more dwellings in designated rural areas, including Kingswood parish. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
492	<ul style="list-style-type: none"> Large scale building of houses locally in Charfield and Wickwar, South Gloucestershire more than provides for all the local housing required. 	Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council's approach to identifying and assessing housing needs.
492, 894	<ul style="list-style-type: none"> Lack of cooperation with South Gloucestershire Council over significant new and planned development between Charfield, Wickwar and Kingswood. 	The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan.
Settlement hierarchy & place making		
No comments received		



Site Reference: Local Sites Allocation Policy PS38 South of Wickwar Road, Kingswood		
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
318	<ul style="list-style-type: none"> Prioritise building of bungalows or flats suitable for older generation to downsize, releasing family housing. 	Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council's approach to identifying and assessing housing need and provides further detail on how the Local Plan addresses specific housing needs, including accommodation for older people and people with disabilities. New Core Policy DCP2 explicitly references an expectation for a range of house types, including two bedroom dwellings and bungalows, as part of major development.
318	<ul style="list-style-type: none"> Need smaller, entry level housing. No need for more 4/5 bed houses. 	
Community facilities		
13, 318, 405, 492, 894	<ul style="list-style-type: none"> Kingswood Primary School is at capacity and cannot grow to accommodate additional pupil yield. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
492, 894	<ul style="list-style-type: none"> Primary Schools in Wotton are at capacity. 	
318, 405	<ul style="list-style-type: none"> KLB Secondary School is at capacity. 	
405	<ul style="list-style-type: none"> There are not enough GP surgeries. 	
13	<ul style="list-style-type: none"> If allocated, this development should provide material benefits for the school, such as a dedicated sports pitch/ play space and two pedestrian crossing points, on Charfield Road Rectory Road, to allow for safe pedestrian crossing. 	Highway safety improvements to access services within the village is identified in the policy wording as a particular issue to address alongside the provision of off-site highway improvements to facilitate safer, accessible pedestrian and cycle access to key destinations in the village highlighted in para 3.7.6.
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
No comments received		
Retail and town centres		
No comments received		

Site Reference: Local Sites Allocation Policy PS38 South of Wickwar Road, Kingswood		
Travel, transport and highways		
291, 492	<ul style="list-style-type: none"> Dangerous access on to Wickwar Road 	On-site specifics, including detailed site access proposals and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.
405	<ul style="list-style-type: none"> Increased traffic and pollution 	<p>Topic Paper – Transport October 2021 ((EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices and addressing air quality.</p> <p>The Sustainability Appraisal includes assessment of all sites and reasonable alternatives against SA 10: To ensure that air quality continues to improve based on sustainable access to employment and key services and facilities, SA Report Appendix 3 - 9 (CD3b).</p> <p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p>
492	<ul style="list-style-type: none"> Limited public transport 	<p>Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.</p> <p>On-site specifics, including highway safety improvements to access services within the village, to be addressed at the masterplan/ planning application stage to deliver on and off-site safer and accessible pedestrian cycle routes to key destinations.</p>
Infrastructure		
405	<ul style="list-style-type: none"> Insufficient drainage 	All sites have been assessed in the SFRA Levels 1 & 2 (EB54) as suitable for allocation with on-site specifics to be agreed at the planning application stage.
Policy wording modifications:		



Site Reference: Local Sites Allocation Policy PS38 South of Wickwar Road, Kingswood		
Our Environment and Surroundings		
Natural environment		
405	<ul style="list-style-type: none"> Increased pollution 	<p>Topic Paper – Transport October 2021 ((EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices and addressing air quality.</p> <p>The Sustainability Appraisal includes assessment of all sites and reasonable alternatives against SA 10: To ensure that air quality continues to improve and SA11: To maintain and enhance the quality of ground and surface waters and to achieve sustainable water resources management in the District, SA Report Appendix 3 - 9 (CD3b).</p> <p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p>
492	<ul style="list-style-type: none"> Too low a density for the good use of land in a key location 400 metres from the Cotswold Way. 	<p>The Council considers the proposed allocation to be of appropriate capacity and in accordance with SALA site assessments for the combined site KIN005 and KIN011.</p>
Landscape		
No comments received		
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		

PS47

Site Reference: Employment Allocation Policy PS47 Land west of Renishaw New Mills		
Number of representations: 14	Support: 3	Object: 7
Comment: 4		
Stakeholders	Comments	Stroud District Council Response
Support		
No comments received	Policy wording modifications: None	
Object		
Lichfields for CEG & Charfield Landowners Consortium (923)	<ul style="list-style-type: none"> The policy is not supported by sufficient evidence of effective joint working on cross-boundary strategic matters with South Gloucestershire. 	The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan.
	<ul style="list-style-type: none"> A full assessment of the impact of the site on Junction 14 should be completed to consider the cumulative impact of development on the highway network 	This site has been tested with other strategic sites through the Traffic Forecasting Report (EB61).
	<ul style="list-style-type: none"> More detail is also required on the form of the mitigation proposed; the cost of the works; how it will be funded with the level of funding anticipated from the strategic development sites clarified. 	Highway mitigation in the form of a new junction at Junction 14 has been tested as part of the transport model. The Council has committed to producing a Funding and Delivery Strategy for transport improvements in partnership with National Highways, South Gloucestershire Council and Gloucestershire County Council. This will be published in due course.
	<ul style="list-style-type: none"> Policy PS47 must reference the transport capacity issues along the B4058 corridor and Junction 14 of the M5. 	
Policy wording modifications: None		
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> GWT is neutral on this allocation. The Marlees Brook and land adjacent to it is a medium priority area for wetland and species-rich grassland habitat creation in the Nature Recovery Network. 	Comment noted
	<ul style="list-style-type: none"> A minimum 10 metre buffer of natural habitat should be created and maintained between the development and the Marlees Brook and a full ecological appraisal should be undertaken. 	On-site specifics; including strategic landscaping and structural landscaping buffers, at the southern tip of the site, along the B4058, and between development and Marlees Brook, to be addressed at the masterplan/planning application stage.
	Policy wording modifications: None	
South	<ul style="list-style-type: none"> It can be anticipated that jobs on this site are likely to 	The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud



Site Reference: Employment Allocation Policy PS47 Land west of Renishaw New Mills		
Gloucestershire Council (914)	<p>be high value and high skilled. Accordingly, they are likely to experience travel patterns from a wide geographical area with associated impact on M4 J14 and Wotton Road in Charfield. It is essential therefore that a robust Transport Assessment and Travel Plan is provided, and SGC consulted at the earliest opportunity</p>	<p>District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan.</p> <p>The Council has prepared a Statement of Common Ground with South Gloucestershire Council, which has acknowledged these requests and where “The parties agree to work together and with National Highways and developers to determine appropriate infrastructure at M5 Junction 14 and associated roads, safeguard land to enable the intervention, detail the triggers and timing for interventions, and devise a funding and delivery strategy for identified improvements” (Duty to Cooperate Statement (EB3).</p>
	<ul style="list-style-type: none"> The impact on M5 J14 should also be referenced and a contribution towards M5 J14 should be included. 	
	<ul style="list-style-type: none"> We note and welcome potential contributions to Charfield Station and the Charfield-Wotton Greenway Project within Policy P47. However, these should be given more prominence and certainty of delivery with ongoing work with SDC and SGC officers on further defining details and delivery mechanisms. 	<p>The Duty to Cooperate Statement October 2021 (EB3) sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan.</p> <p>The Council has prepared a Statement of Common Ground with South Gloucestershire Council, which has acknowledged these requests and where “Stroud District Council acknowledges the need for the Stroud District Local Plan to set out clearly the necessary infrastructure required for each strategic development and how it will be delivered, together with clarity on the transport assessment work and travel plans required from developers” (Duty to Cooperate Statement (EB3).</p>
Policy wording modifications: None		
Environment Agency (933)	<ul style="list-style-type: none"> A natural corridor and the floodplain should be retained. Landscaping should be undertaken in a sustainable and sensitive manner, and be in-keeping with the other polices in the plan particularly Policy ES4. 	<p>On-site specifics; including strategic landscaping and structural landscaping buffers, at the southern tip of the site, along the B4058, and between development and Marlees Brook, to be addressed at the masterplan/ planning application stage.</p>
	Policy wording modifications: None	
Kingswood Parish Council (956)	<ul style="list-style-type: none"> Viability concerns regarding recent uncertainty on the future of Renishaw Plc and the potential decline of the manufacturing industry. 	<p>The Gloucestershire Economic Needs Assessment (EB29) states that advanced manufacturing is healthy across Gloucestershire with particularly strong growth seen in Stroud between 2009 - 2018. This does not reflect the national decline.</p>
	<ul style="list-style-type: none"> Infrastructure issue has not been addressed. 	<p>The council has produced an Infrastructure Delivery Plan (IDP) to support</p>

Site Reference: Employment Allocation Policy PS47 Land west of Renishaw New Mills		
		future development (EB69). Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation This will be published in due course.
	<ul style="list-style-type: none"> The plan is in conflict with paragraph 20b) of the NPPF, as strategic policies do not make sufficient provision for wastewater infrastructure. 	All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP (EB69).
	<ul style="list-style-type: none"> No public transport links to/ from the site 	Topic Paper – Transport October 2021 (EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.
Policy wording modifications: None		
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		
192	<ul style="list-style-type: none"> Too many houses. There will not be anywhere near as many 'affordable homes' as will be promised. 	Comment not relevant to this Policy
Settlement hierarchy and place making		
No comments received		
Infrastructure and developer contributions		
No comments received		
Policy wording modifications: None		
Homes and Communities		
Housing		
No comments received		
Community facilities		



Site Reference: Employment Allocation Policy PS47 Land west of Renishaw New Mills		
No comments received		
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
13	<ul style="list-style-type: none"> Additional local employment opportunities welcomed. 	Comment noted
423	<ul style="list-style-type: none"> The plan implies that it will hamper the extension of Renishaw in the future. If this occurs then Renishaw will be left with no option but to move elsewhere. 	The plan does not hamper any future plans at Renishaw. This has been provided for by the extension of the boundary to the Key Employment Site EK17 – Renishaw New Mills, under Delivery Policy EI1.
492	<ul style="list-style-type: none"> With Renishaw for sale and space available already on the Renishaw site, there is no need for more building. 	The Employment Land Review (EB30) supports need for new development at this location. Its commentary details that plans are “ <i>well established and progressing for high value advance manufacturing business</i> ”. The site is being actively promoted through the planning application process.
Retail and town centres		
No comments received		
Travel, transport and highways		
405, 318	<ul style="list-style-type: none"> Poor roads, increased traffic, increased pollution, increase in numbers of people commuting to work, pressure on the motorways. 	<p>Topic Paper – Transport October 2021 (EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices and addressing air quality.</p> <p>The Sustainability Appraisal includes assessment of all sites and reasonable alternatives against SA 10: To ensure that air quality continues to improve based on sustainable access to employment and key services and facilities, SA Report Appendix 3 - 9 (CD3b).</p>
Infrastructure		
No comments received		
Policy wording modifications: None		



Site Reference: Employment Allocation Policy PS47 Land west of Renishaw New Mills		
Our Environment and Surroundings		
Natural environment		
405	<ul style="list-style-type: none"> Pressure on the countryside and wildlife. 	<p>The Council considers Local Site Allocation PS47 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.</p> <p>On-site specifics; including minimising any potential impact upon key views of and from the AONB and enhancing local biodiversity, to be addressed at the masterplan/ planning application stage.</p>
492	<ul style="list-style-type: none"> This land is prime agricultural land 	<p>Sites that are on greenfield land classed as high quality agricultural land (Grades 1, 2 or 3a) are rated red, as having a significant negative (--) effect, for efficiency in land use and protection of soil quality regardless of size. Sites are allocated having regard to Sustainability Appraisal across 17 SA objectives; this is a balanced judgement taking all objectives into consideration, SA Report Appendix 4 (CD3b).</p>
Landscape		
No comments received		
Historic environment		
No comments received		
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		

PS41

Site Reference: Local Sites Allocation Policy PS41 Washwell Fields, Painswick				
Number of representations: 39		Support: 5	Object: 30	Comment: 4
Stakeholders	Comments		Stroud District Council Response	
Support				
SDC Cllr Haydn Jones (500)	<ul style="list-style-type: none"> Example of dispersed development, the favoured choice of development strategy expressed by residents at all phases of consultation. 		Comment noted	
Policy wording modifications: None				
Cotswolds Conservation Board (688)	<ul style="list-style-type: none"> Contributes to meeting local housing needs without adversely affecting the natural beauty of the Cotswolds Area of Outstanding Natural Beauty. 		Comment noted	
Policy wording modifications: None				
Object				
Chilmark Consulting for Charterhouse Strategic Land (865)	<ul style="list-style-type: none"> The site is not capable of delivering up to 20 dwellings taking into account access, heritage and landscape constraints. 		The Council considers the proposed allocation to be of appropriate capacity in accordance with the SALA site assessment. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and key factors taken into consideration.	
	<ul style="list-style-type: none"> Fails to address local housing need for smaller properties suitable for downsizing or starter homes. 		Topic Paper: Housing needs and supply October 2021 (EB8) evidences the Council's approach to identifying and assessing housing need and provides further detail on how the Local Plan addresses specific housing needs. New Core Policy DCP2 explicitly references an expectation for major housing development* to provide a range of house types, including two bedroom dwellings and bungalows; and Core Policy CP8 New housing development requires the range of types, tenure and sizes on sites of 10 dwellings or more*, to reflect identified local housing needs. (*For the purposes of these plan policies, major housing development is defined as a site providing 10 or more dwellings or outline residential development on a site of 0.5ha or larger; this differs from the definition of major development in the AONB, which is explained in the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39)).	
	<ul style="list-style-type: none"> Provides an insufficient number of homes for Painswick and the Cotswold cluster. 		The Council considers the proposed Local Site Allocation PS41 to be of appropriate scale and size for this Tier 2 AONB settlement. Justification for the role of Painswick in the development strategy and the allocation of site	



Site Reference: Local Sites Allocation Policy PS41 Washwell Fields, Painswick		
		PS41 to help meet identified local needs is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).
	<ul style="list-style-type: none"> No clear, systematic or comprehensive analysis presented as to the preference for PS41 above other potential sites, including CSL’s land interest at Clattergrove, Painswick. 	<p>The Council considers Local Site Allocation PS41 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including comparative assessment against all reasonable alternatives.</p> <p>The SALA identified that the land at Clattergrove (SALA PAI013) is not suitable for development because of likely high landscape impact. SA Appendix 9 (CD3b) sets out the audit trail of site options: The site was promoted at Emerging Strategy stage; it was not included as a potential site in The Draft Plan (2019), because the site is located within the Cotswolds Area of Outstanding Natural Beauty, where the highest status is given to landscape protection. Housing development would extend built development to the detriment of the rural character of the area and coalesce existing sporadic development. There are therefore potential impacts preventing sustainable development in this location.</p>
	<ul style="list-style-type: none"> Painswick’s local housing need not specified and there is unclear evidence of the affordable housing need for those with a local connection within the AONB which cannot be met elsewhere and the justification for this restriction. 	<p>The Council considers the proposed Local Site Allocation PS41 to be of appropriate scale and size for this Tier 2 AONB settlement. Justification for the role of Painswick in the development strategy and the allocation of site PS41 to help meet identified local needs is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).</p> <p>Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 4 or more dwellings within the Cotswolds AONB. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component</p>



Site Reference: Local Sites Allocation Policy PS41 Washwell Fields, Painswick		
		elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
	<ul style="list-style-type: none"> Lower Washwell Lane inadequate to cater for additional development. 	On-site specifics, including detailed site access proposals to achieve an appropriate access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.
	<ul style="list-style-type: none"> A46/ Lower Washwell Lane junction inadequate and unsafe to cater for additional traffic. 	
	<ul style="list-style-type: none"> Potential for adverse effects on ecology, habitats and protected species. 	On-site specifics, including addressing potential ecological and landscape impacts, through the retention and enhancement of mature landscape features, to be addressed at the masterplan/ planning application stage.
	<ul style="list-style-type: none"> Potential for a significant adverse effects on the setting of Grade II listed Washwell House 	On-site specifics, including conserving heritage interests and their setting through high quality design and appropriate scale, to be addressed at the masterplan/ planning application stage.
	<ul style="list-style-type: none"> Alternative sites should be identified and allocated, including CSL's site at Clattergrove, Painswick. 	<p>The Council considers Local Site Allocation PS41 suitable for development. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance in terms of site selection, including comparative assessment against all reasonable alternatives.</p> <p>The SALA identified that the land at Clattergrove (SALA PAI013) is not suitable for development because of likely high landscape impact. SA Appendix 9 (CD3b) sets out the audit trail of site options: The site was promoted at Emerging Strategy stage; it was not included as a potential site in The Draft Plan (2019), because the site is located within the Cotswolds Area of Outstanding Natural Beauty, where the highest status is given to landscape protection. Housing development would extend built development to the detriment of the rural character of the area and coalesce existing sporadic development. There are therefore potential impacts preventing sustainable development in this location.</p>
	Policy wording modifications: None	
Comment		
Gloucestershire Wildlife Trust (202)	<ul style="list-style-type: none"> No significant initial concerns subject to a full ecological appraisal. 	Comment noted



Site Reference: Local Sites Allocation Policy PS41 Washwell Fields, Painswick		
	Policy wording modifications: None	
Painswick Parish Council (841)	<ul style="list-style-type: none"> The site should not be included as an allocation until proved deliverable with access and drainage issues resolved. 	All sites have been assessed with the statutory bodies, Severn Trent and Wessex Water. Any mitigation required is included in the IDP (EB69).
	Policy wording modifications: None	
Other representations	Issues raised	Stroud District Council Response
Development Strategy		
Delivering carbon neutral		
No comments received		
Strategic growth and development locations		
17, 18, 85, 86, 161, 502, 773	<ul style="list-style-type: none"> Restrictive covenant preventing development on the southern part of the site. 	Issue is being investigated with promoters solicitor
192	<ul style="list-style-type: none"> Too many houses overall and doubts over affordable housing delivery. 	Core Policy CP9 Affordable housing sets out a requirement to provide at least 30% affordable housing on sites capable of providing 4 or more dwellings within the Cotswolds AONB. Topic Paper: Housing needs and supply October 2021 (EB8) evidences delivery of the different component elements of housing land supply and provides further detail on how the Local Plan addresses specific housing needs, including affordable housing.
86	<ul style="list-style-type: none"> Location contrary to policies for the provision of local housing close to employment centres. 	The Council considers the proposed allocation to be of appropriate scale and size for this Tier 2 settlement. Justification for the role of Painswick in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).
Settlement hierarchy and place making		
17, 18, 86, 502, 559, 560, 773, 926	<ul style="list-style-type: none"> Contest Tier 2 settlement classification. Consider Painswick should remain a Tier 3 settlement. 	Justification for the role of Painswick as a Tier 2 settlement in the settlement hierarchy is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72).
Infrastructure and developer contributions		
No comments		



Site Reference: Local Sites Allocation Policy PS41 Washwell Fields, Painswick		
received		
Policy wording modifications: None		
Homes and Communities		
Housing		
85, 773	<ul style="list-style-type: none"> Impact on existing adjacent properties and property values. 	Core Policy CP8 New housing development sets out requirements for good design to ensure development is appropriate in townscape, local environment, character and amenity terms.
Community facilities		
17, 163	<ul style="list-style-type: none"> Level of services, shops and amenities inadequate to support development of 20 dwellings. 	The Council considers the proposed allocation to be of appropriate scale and size for this Tier 2 settlement. Justification for the role of Painswick in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).
405	<ul style="list-style-type: none"> Insufficient schools and education provision. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
376	<ul style="list-style-type: none"> Impact on quality of life of existing community from additional development and associated traffic. 	The Council considers the proposed allocation to be of appropriate scale and size for this Tier 2 settlement. Justification for the role of Painswick in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).
Policy wording modifications: None		
Economy and Infrastructure		
Employment		
85	<ul style="list-style-type: none"> Limited local employment opportunities. 	The Council considers the proposed allocation to be of appropriate scale and size for this Tier 2 settlement. Justification for the role of Painswick in the development strategy and the allocation of sites is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72) and the Topic Paper: Assessment and selection of sites October 2021 (EB9).
Retail and town centres		
No comments received		
Travel, transport and highways		



Site Reference: Local Sites Allocation Policy PS41 Washwell Fields, Painswick		
17, 18, 85, 86, 161, 163, 171, 212, 502, 559, 560, 605, 773, 922, 926	<ul style="list-style-type: none"> Lower Washwell Lane unsuitable as main access due to narrow width, configuration, dangerous junction with A46, on-street parking, lack of pavements, safety of pedestrians accessing the recreation ground and walking to school. 	On-site specifics, including detailed site access proposals to achieve an appropriate access and highway safety, to be agreed at the planning application stage with Gloucestershire Highways.
17, 18, 85, 86, 559, 922	<ul style="list-style-type: none"> Additional traffic congestion on Vicarage Street, Stamages Lane, Lower Washwell Lane and Pullens Road. 	
85, 86, 212	<ul style="list-style-type: none"> Access should be direct from A46. 	
85	<ul style="list-style-type: none"> Increase in commuting traffic and associated air quality impacts. 	<p>Topic Paper – Transport October 2021 ((EB6) sets out the range of transport evidence considered to ensure the most effective and appropriate development strategy in transport terms, including the Sustainable Transport Strategy (EB60a), for delivering sustainable transport choices and addressing air quality.</p> <p>The Sustainability Appraisal includes assessment of all sites and reasonable alternatives against SA 10: To ensure that air quality continues to improve based on sustainable access to employment and key services and facilities, SA Report Appendix 3 - 9 (CD3b).</p> <p>The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.</p>
Infrastructure		
85, 559	<ul style="list-style-type: none"> Inadequate infrastructure to serve new development. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
922	<ul style="list-style-type: none"> Concern regarding disposal of surface water/ sewerage. 	Ahead of the EIP, the Council is updating its IDP/Infrastructure evidence base and documentation. This will be published in due course.
Policy wording modifications: None		
Our Environment and Surroundings		
Natural environment		
17, 86	<ul style="list-style-type: none"> Loss of ancient pasture. 	The Council considers Local Site Allocation PS41 suitable for development.



Site Reference: Local Sites Allocation Policy PS41 Washwell Fields, Painswick		
85, 773, 922, 926	<ul style="list-style-type: none"> Loss of habitat and impact on wildlife and flora. 	Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.
560	<ul style="list-style-type: none"> Insufficient weight given to the protection and enhancement of the natural environment and biodiversity within the Cotswolds AONB. 	On-site specifics; including addressing potential ecological and landscape impacts, through the retention and enhancement of mature landscape features, to be addressed at the masterplan/ planning application stage.
709	<ul style="list-style-type: none"> Do not allow any hard non porous standing, parking areas for vehicles, including private drives. 	Comment noted
Landscape		
85, 161	<ul style="list-style-type: none"> Visual impact on Cotswolds AONB and long distance views. 	On-site specifics, including addressing potential landscape impacts, through the retention and enhancement of mature landscape features, to be addressed at the masterplan/ planning application stage.
Historic environment		
85, 161	<ul style="list-style-type: none"> Impacts on Conservation Area from development and additional traffic. 	On-site specifics, including conserving heritage interests and their setting through high quality design and appropriate scale, to be addressed at the masterplan/ planning application stage.
Policy wording modifications: None		
Delivery and Monitoring		
No comments received		
Policy wording modifications: None		

