



Cambridge and South Cambridgeshire Local Plan Examination Objectively Assessed Housing Need: Response to Objectors

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1 INTRODUCTION

- 1.1 This paper, submitted on behalf of Cambridge and South Cambridgeshire Councils, responds to the principal objections received in the Local Plan consultation held in December 2015 - January 2016 concerning the objective assessment of need for housing.
- 1.2 The Councils' evidence on housing needs was developed in two stages. The first stage was the Cambridge Sub-region Strategic Housing Market Assessment (SHMA), produced by the Cambridgeshire Research Group in 2013, whose findings informed the submitted Local Plans for the two local authority areas. The SHMA concluded that objectively assessed housing need over the plan period 2011-31 was 19,000 net new dwellings for South Cambridgeshire and 14,000 for Cambridge. Following examination hearings, the Local Plan Inspectors wrote to the Councils in May 2015 asking them to consider whether that assessment was compliant with national planning guidance (the PPG) in three respects:
- i Whether the 'demographic starting point' should change in the light of the official 2012-based official household projections recently published by the Department of Communities and Local Government (CLG);
 - ii Whether the starting point should be adjusted upwards in the light of market signals;
 - iii Whether it should be adjusted upwards in order to provide more affordable housing.
- 1.3 These questions were addressed in the report entitled *Objectively Assessed Need: Further Evidence*, produced by Peter Brett Associates for the Councils in November 2015. That study concluded that the OAN for South Cambridgeshire should be slightly increased to 19,337 dwellings but found no justification to adjust the figure of 14,000 for Cambridge.
- 1.4 The present paper clarifies and expands on aspects of the Further Evidence report in response to objectors' comments. Like that earlier report, it focuses on the three questions raised by the Inspector. It sets aside other issues raised by objectors, because the Inspectors did not ask any questions on these issues, implying that they were adequately covered by the SHMA and need not be re-opened. Accordingly we do not provide any analysis on the definition of the housing market area, the prospect that international migration might exceed the official projections or possible overspill from London – where we also note that no request to co-operate has been made by the Mayor of London or neighbouring authorities.
- 1.5 Nor do we revisit the alignment of jobs and housing. The SHMA considered this issue across the housing market area as a whole, identifying a balance between jobs and homes with slightly more homes than jobs across the HMA, and its findings informed a Memorandum of Co-operation which has been agreed by local planning authorities across the area. The Councils note that the latest update of the East of England Forecasting Model (EEFM) is to be published shortly, and before the examination

hearings re-start in June 2016. Once the update is published the Councils will consider it and if appropriate will provide a report to the examining Inspectors on its implications.

- 1.6 Below, we discuss the 'starting point' demographic projections in Section 2, market signals in Section 3 and affordable housing in Section 4. Conclusions are summarised in Section 5.

2 DEMOGRAPHIC PROJECTIONS

Introduction

- 2.1 In line with national guidance, the demographic projections that provide the starting point for housing needs assessment are produced in three steps. The first step is to project the resident population. The second is to project household numbers, which means subtracting the minority who live in institutional establishments (such as student halls of residence and care homes) and translating the remaining population into households through household formation rates. Thirdly and finally, households are translated into dwellings through a small adjustment for vacant and second homes.
- 2.2 In the present case debate has focussed on the second step in the calculation, and specifically the factor that turns the household population into households. This factor, known variously as household formation rates, representative rates (HRRs) or headship rates, is the proportion of people of each age and sex who are housing representatives (formerly known as heads of household). Since each household has just one representative, for any given population higher formation rates result in more households and hence greater housing need.
- 2.3 The Further Evidence report took its household formation rates from the 2012-based CLG household projection (CLG), which was the latest official release at the time and remains so. Several objectors maintain that these rates should be increased, particularly for younger adults, to provide a partial or total return to the higher rates expected by the earlier CLG 2008 projection.
- 2.4 As is usual in these debates, two separate reasons are being put forward for uplifting household formation rates, though they are not always clearly distinguished:
- the first reason relates to the nation as a whole: it is argued that the CLG 2012 formation rates carry forward the impact of the last recession and its aftermath, whereas in reality this impact will wear off in future as the economy recovers. If that argument were correct, then the CLG 2012 household formation rates would be underestimates across England, so they should be adjusted upwards across England.
 - the second argument relates to local markets: it says that in certain areas housing land supply in the past fell short of demand, and demographic projections for those areas carry forward that shortfall into the future. In areas where this is the case, the projected HRR for those specific areas will be underestimated and should be adjusted upwards.
- 2.5 Below, we discuss these two arguments in turn.

National formation rates and the recession

National guidance and academic research

- 2.6 The view that the CLG 2012 headship rates are underestimated at national level is rejected by national planning guidance. As noted in the 2015 Further Evidence report, the PPG at para 016 advises that CLG 2012 is *'the most up-to-date evidence of future household growth'*. It follows that the formation rates in that projection should be the default choice for plan-makers.
- 2.7 This is also the conclusion from authoritative research, found in two recent academic articles: respectively by Prof Ludi Simpson¹ and by Neil MacDonald and Prof Christine Whitehead². Both articles provide in depth analysis of the 2008 and 2012 projections. The first article finds that:
- '[The] causes of reduced household formation [in the 2012 projections against the 2008 ones] are varied, began before the recession, and mostly are likely to continue with or without recession.'*
- 2.8 The causes referred to include:
- *'a sustained increase among young people not leaving home' which began at the turn of the century and accelerated after 2008;*
 - *the introduction of student fees from 1998;*
 - *the increase in precarious employment, including the rapid growth of part-time work;*
 - *the long-term increase in the number of childless women, ... which increased the number of smaller households, [and which] stopped and has fallen since 2000'; and*
 - *the increasingly older formation of couples or families, which had increased the number of single-person households in the 1980s and 1990s, [and] has levelled out since 2001'.*
- 2.9 Prof Simpson concludes that some of these factors may be reversed, but the first three *'appear at the moment as fixed circumstances of the policy and economic environment'*. *Consequently 'we are not in a position to expect further increases in household formation rates of the same kind [as suggested in the 2008-based projections]. ... The future in the UK is likely to be a continuation of precarious household formation. It will probably be lower than once projected and carry more uncertainty...'*
- 2.10 In the second article listed above, McDonald and Whitehead endorse these conclusions. They find that the difference between the CLG 2012 and CLG 2008 projections have two main causes:

¹ L Simpson, *Whither household projections?* in *Town and Country Planning*, December 2014, Vol 83, CD26

² N McDonald and C Whitehead, *New estimates of housing requirements in England, 2012 to 2037*, CD27

- *First, 20% of the difference between the 2008-based projections and the latest projections arises because there are expected to be more couples – and so fewer households for a given population. These changes are not likely to be reversed – in part because older men are living longer.*
 - *Second, there have been much longer-term trends in declining household formation (mostly among younger households), starting in the early 1990s, which were not fully reflected in the 2008 projections. These were perhaps exacerbated by the credit crunch and the recession, but there are more fundamental housing market and other reasons for these trends (such as higher education related debt) that are unlikely to reverse as the economy moves out of recession.*
- 2.11 McDonald and Whitehead add that there are further factors to suggest that household formation could be even lower than the 2012 official projections show – including welfare reforms and rising student debt that had not yet occurred at the time of the 2011 Census and are not taken into account by the 2012 projections.
- 2.12 McDonald and Whitehead also demonstrate that, although the CLG 2012 shows lower HRRs than CLG 2008, it still shows improving HRRs overall. Their analysis finds that, while rates increase for some groups and fall for others, *‘there will be more “winners” than “losers” by a ratio of 3:1, so overall housing formation rates will improve’*. This means that, on balance, more people will have *‘an increased chance of setting up their own household’*.
- 2.13 McDonald and Whitehead conclude that the 2012 projections:
‘can be taken as a reasonable indication of what is likely to happen to household formation rates if recent trends continue. This is because, although economic growth might be expected to increase the household formation rate, there are both longer-term structural changes and other factors still in the pipeline (such as welfare reforms) that could offset any such increase.’
- 2.14 The research quoted above reinforces the view of the PPG. At national level the headship rates shown in CLG 2012 are the best information available at present. Far from reflecting underlying long-term trends, the rates that CLG projected in 2008 represented a view which was over-optimistic at the time, and has since become even more so in the intervening years. The reasons for this are factors that suppress demand as opposed to supply. Thus, fewer women are remaining childless; more people live in couples (partly because men live longer so there are fewer widows); work is more precarious, social benefits lower, and young people increasingly burdened by student debt.
- 2.15 Because household demand continues to be suppressed by these factors, in the foreseeable future household formation rates will not rise as the CLG 2008 projection expected, no matter how much land planning authorities supply.

Inspectors’ findings

- 2.16 Planning Inspectors who have taken the same view in recent examinations and appeal include the following.

- Inspector Cullingford (September 2015) in the Mickleton (Cotswold) appeal decision (provided at Appendix A below):
'The proffered explanation that past trends will return as constraints caused by the recession and housing unaffordability ease, fails to address either the evident onset of declining headship rates some 8 years before the 'crash' (during which time the markets, awash with mortgage finance, staged a mini house building boom) or the foreseeable continuation of further severe constraints manifest in the added burden of financing higher education, the absence of previously available welfare benefits and the post-recession tightening of mortgages.'
- Inspector Pratt (November 2015) on the Stroud Local Plan (Appendix 2):
'Since the earlier 2008-based and interim 2011-based projections have been superseded by more recent projections, there is little reason to use the trends based on these earlier projections.'
- Inspector Ward (September 2015) on the Charnwood Local Plan (Appendix 3):
'Whilst there are concerns regarding the extent to which the 2012-based household projections are affected by past economic conditions, they are statistically robust ... They are the most up to date projections available.'

- 2.17 By contrast, at Canterbury (August 2015) Inspector Moore took a different view. He agreed with the Council's 'partial catch-up' (or partial return) scenario, in which HRRs were a mid-point between the 2008 and 2012 CLG projections. But his conclusion was based on a range of evidence considered in the round - including market signals which strongly suggested that Canterbury had undersupplied housing land against demand and need, and therefore the demographic projections should be adjusted upwards.
- 2.18 Thus, the Canterbury Inspector is not suggesting that the CLG 2012-based HRRs are too low in general. Rather, he is suggesting that they are too low in Canterbury specifically, because by projecting local reality into the future the CLG 2012 figures carry forward past underprovision³.
- 2.19 In summary, recent Inspectors' findings confirm that upward adjustment to the 2012 formation rates is only appropriate if there is local evidence that household formation has been suppressed by supply constraints. This view is in line with the PPG, which advises that the CLG 2012 projections provide the best information on future household growth available at this time, but allows the projections to be adjusted if local evidence justifies it.
- 2.20 In the next section we look for such evidence in Cambridge City and South Cambridgeshire.

Local formation rates and supply constraints

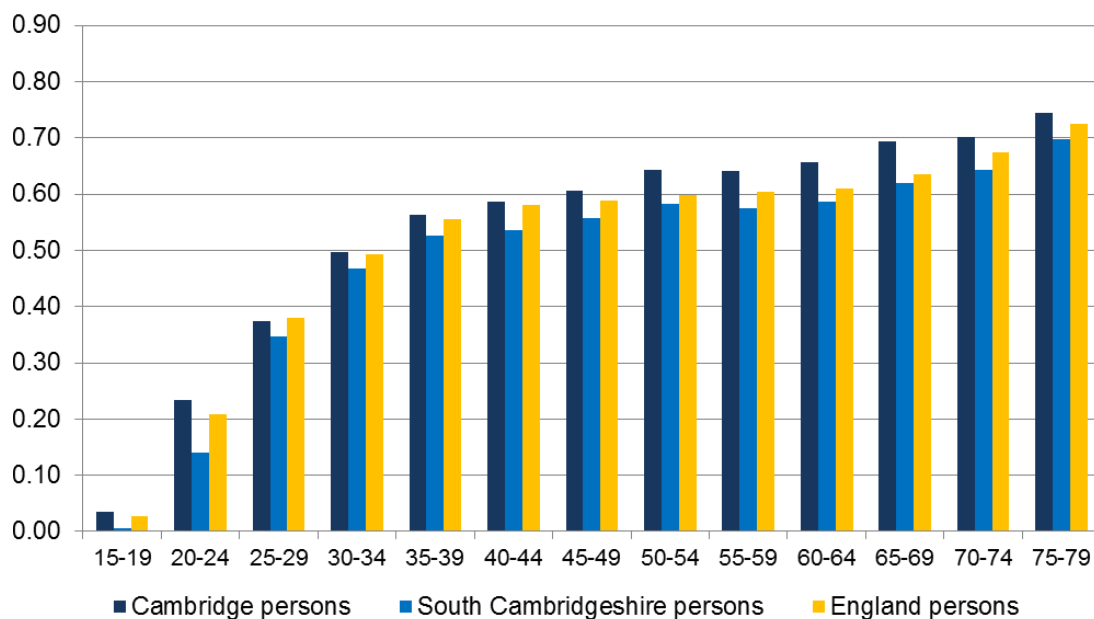
- 2.21 For this analysis our starting point is paragraph 015 of the PPG:

³ Para 26, Note on main outcomes of Stage 1 hearings, August 2015, CD31

'The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.'

- 2.22 The logic of the PPG is clear. As mentioned earlier, demographic projections roll forward trends from a past period known as the base period or reference period. If in that period planning underprovided land against demand or need, actual housing development – and hence household growth – will also have fallen short of that demand or need. By the same token, since projections roll forward that past growth into the future, they will understate future demand or need, and therefore should be adjusted upwards.
- 2.23 To see if this is the case in Cambridge and South Cambridgeshire, in Figure 2.1 below we compare local housing formation rates at the 2011 Census with the national benchmark. For simplicity we have combined male and female rates.

Figure 2.1 Household formation rates, 2011, persons by age group



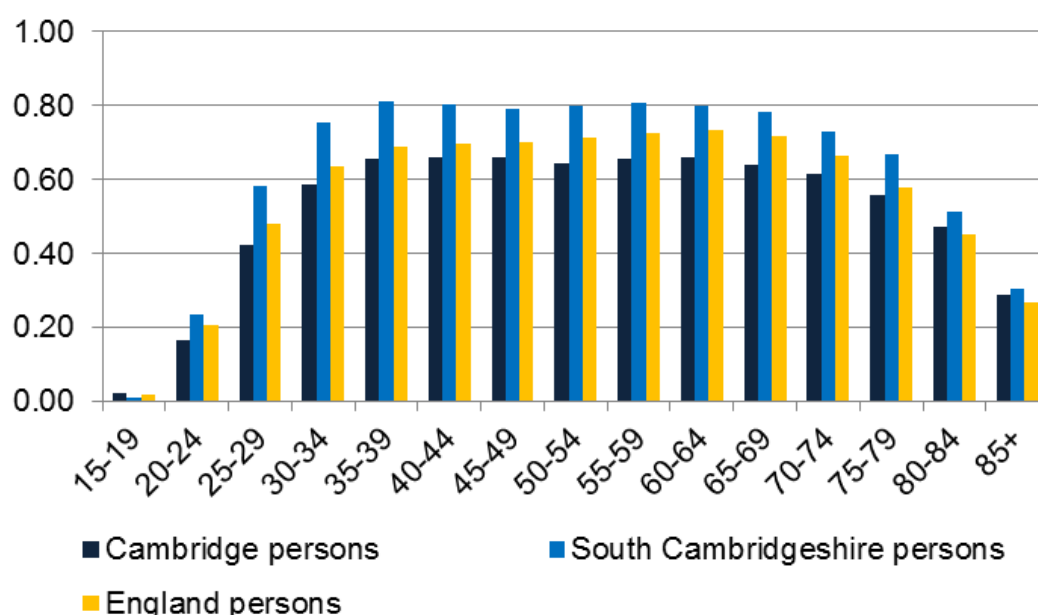
Source Census

- 2.24 We are interested specifically in the ages from 25 to 34 or 39, because these are the groups for whom housing formation is particularly likely to be suppressed by housing difficulties. The problem may be on the demand side (low / falling incomes, credit crunch) or on the supply side (lack of housing land). Either way, the result is that younger people live in the parental home for longer, or share with others, rather than forming their own households. However, even for these groups differences in

household formation may be due to factors quite unrelated to the housing market, as we shall see shortly.

- 2.25 In Figure 2.1 we see that household formation rates for ages 24-39 are very close to England (for those 20-24 the rates are higher in Cambridge, presumably due to students). In contrast South Cambridgeshire has lower formation rates than England for these age groups, and indeed for all age groups. The evidence suggests that this is nothing to do with the housing market. Rather, the explanation is that South Cambridgeshire has above-average proportions of people living in couples, as shown in Figure 2.2 below.

Figure 2.2 Proportion of persons living in couples, by age group, 2011



Source: Census

- 2.26 As mentioned earlier, people in couples generally have lower household formation rates than others, because only one member of the couple is a household reference person. In Cambridge, people aged 25-39 are slightly less likely to live in a couple than in England. By contrast, in South Cambridgeshire people in those age groups, and indeed all age groups, are significantly more likely to live in couples. It seems that this lifestyle difference is the major factor behind South Cambridgeshire's comparatively low household formation rates.
- 2.27 The above analysis serves as a warning. If we believe (mistakenly) that differences in formation rates always reflect the balance of the housing market, then Figure 2.1 tells us that the market is tightly constrained in South Cambridgeshire, while in Cambridge supply is relatively generous. In reality the reverse is the case, as is widely agreed by objectors and confirmed by the market signals analysis in the Further Evidence report and Section 3 below.
- 2.28 In summary, we should not automatically interpret local formation rates as indicators of constrained housing supply, because the rates may depend on factors which are nothing to do with that supply. Even less should we use adjusted formation rates to

provide measures of housing need, because where such factors are at work the adjustments are very likely to be wrong.

Conclusion

- 2.29 The analysis above supports the conclusion of the Further Evidence report, that there is no justification for upward adjustment to the CLG 2012 household formation rates. At national level those rates provide the best available view of future household formation, as stated in the PPG and confirmed by authoritative studies and recent Inspectors' findings. At a local level the evidence from formation rates does not provide robust evidence on the balance of the market.
- 2.30 As discussed in Section 3 below we do consider that both Cambridge and South Cambridgeshire have supply-constrained housing markets, and therefore the 'starting point' demographic projections understate future housing need and should be adjusted upwards. But to make this adjustment we adjust the housing number directly, rather than amend household formation rates. One reason for this is that formation rates are an unreliable indicator of housing market balance, because it is too much influenced by other factors, as discussed above. Another reason is that in real life, supply constraints suppress net in-migration as well as household formation rates. Therefore, even if formation rates did provide a measure of market balance it would be an incomplete measure.

3 MARKET SIGNALS

- 3.1 The Further Evidence report analysed the market signals listed in the PPG and concluded that they warranted upward adjustment to the 'demographic starting point' for both local authority areas. Accordingly it suggested an uplift of 30% for Cambridge and 10% for South Cambridgeshire. These figures were based on the three other areas where Inspectors had come to a view on market signals adjustments. Considering market signals in the round, we concluded that market signals for Cambridge were similar to Canterbury, where the Local Plan Inspector had suggested a 30% uplift, and market signals in South Cambridgeshire were similar to Eastleigh and Uttlesford, where he advised a 10% uplift. Both these uplifts covered affordable housing need as well as market signals. (Since then, Inspector Laura Graham has added to the list of precedents, supporting an uplift of 13% for Brighton and Hove to cover market signals and affordable need). We noted that these conclusions were inevitably based on judgment, rather than empirical based analysis.
- 3.2 A number of objectors challenge these judgments, arguing that adjustments for Cambridge and South Cambridgeshire should be higher. But they generally do not provide new evidence in support of their view. The main exception is Savills, who provide an analysis of house prices since the 2007 peak. The Savills paper⁴ compares house price growth for different geographical areas since the 2007 cyclical peak. It purports to show that prices in Cambridge since 2011 have soared far ahead of Canterbury, and prices in South Cambridgeshire since 2014 have accelerated ahead of Canterbury as well as Eastleigh and Uttlesford.
- 3.3 Savills' conclusions from these figures are not correct. Comparisons of rates of change between different areas are highly sensitive to the period being analysed. Depending on choice of start and end dates it is possible to reach almost any conclusion. In relation to the Savills' data we see no particular reason for choosing as a start date the 2007 peak. Alternative start and end dates would lead to different conclusions on the relative position of Cambridge and South Cambridgeshire.
- 3.4 This is clear from the charts below, which show comparative house price changes in 2003-13 and 2007-12. We chose these periods to match the base period whose trends our starting point demographic scenarios carry forward. For Cambridge that base period is 2003-13. For South Cambridgeshire our demographic starting point is the official SNPP 2012 projection, whose base period is 2007-12, but as shown in the Further Evidence report a base period of 2003-13 produces a very similar projection. If household growth in these periods were suppressed by underprovision of housing land, the demographic projections based on that period will underestimate housing demand and should be adjusted upwards.

⁴ Savills, *Cambridge & South Cambridgeshire Housing Requirements, Market Signals*

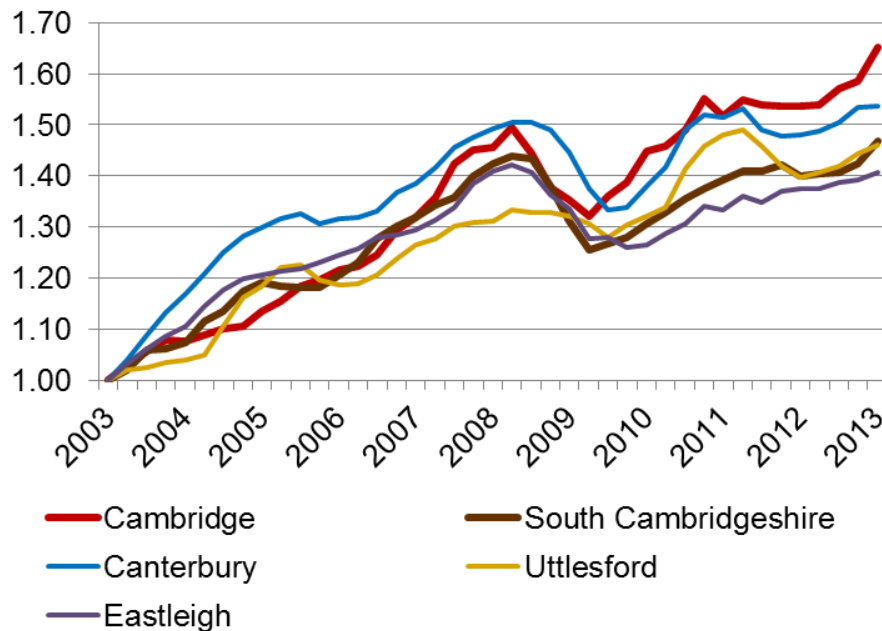
- When change is measured over relevant time periods, the house price comparison seems much more in line with earlier Inspectors' decisions and our own analysis in the Further Evidence report. Between 2003 and 2013 (

3.5 Figure 3.1):

- Cambridge and Canterbury show markedly faster growth than the other areas shown – Canterbury through most of the period and Cambridge only since the recession.
- South Cambridge, Eastleigh and Uttlesford follow similar paths, with slower growth than Cambridge and Canterbury.

Figure 3.1 Change in mean house prices, 2003-13

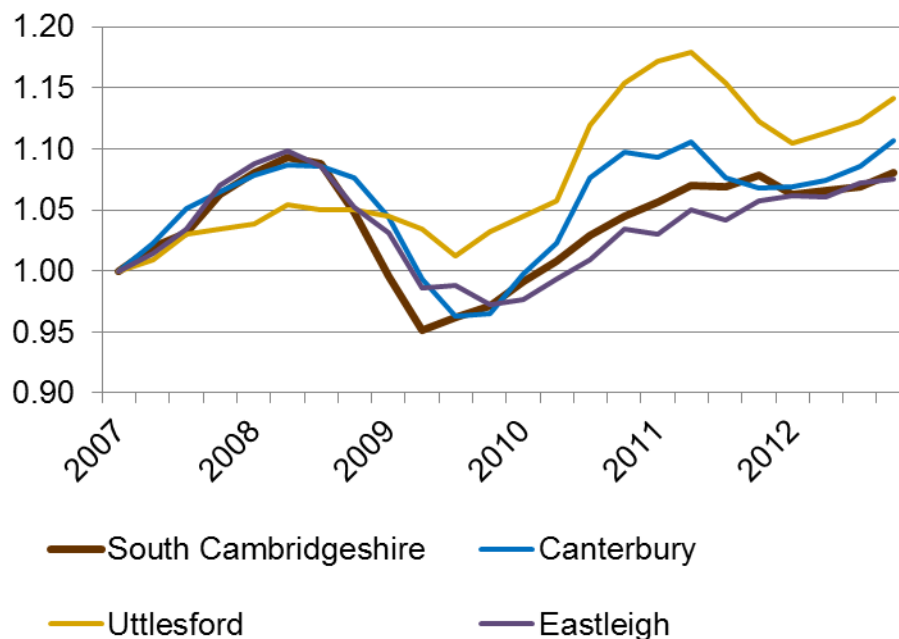
Index 2003=100



Source: ONS

- 3.6 Over the period 2007-12, which is relevant to the South Cambridgeshire demographic projection only, South Cambridgeshire shows similar growth to Eastleigh and Canterbury, which are also similar to each other (Figure 3.2). Prices in Uttlesford in most of the period grew faster than these three areas. The main lesson from Figure 3.2 is perhaps that five years is too short a period to draw meaningful house price comparisons.

Figure 3.2 Change in mean house prices, 2007-12
Index 2007=100



Source: ONS

- 3.7 As well as house prices Savills analyse affordability. They note that the official affordability indicator, which is the ratio of lower-quartile house prices to lower-quartile earnings, is only available up to 2013. Accordingly they use an alternative indicator, (Figure 5), the ratio of median prices to median earnings, which they update to 2014. The main finding of Savills' analysis is that for Cambridge this alternative ratio rose sharply in 2014, greatly increasing the gap between the city and other areas.
- 3.8 We have been unable to replicate Savills' calculation. But in any case data for 2014 tells us nothing about whether the starting point demographic projections should be uplifted, because these projections carry forward trends that ended in 2013. Thus, the projections take no account of anything that happened in 2014. If the city's supply in that year deteriorated relative to demand, the projections will not carry forward that deterioration; they cannot carry it forward because they do not know about it.
- 3.9 Finally Savills briefly discuss the price of development land in Cambridge against the East of England region. Again the period analysed is from 2007 peak to the latest date for which information is available, in this case the first quarter of 2015. This analysis tells us nothing about the market signals uplift, for the same reasons as the Savills' house price analysis discussed earlier: the period analysed bears no relationship to the demographic projections, and if a different period was used the city's comparative position would look different.
- 3.10 Unlike house prices, we cannot analyse land price change over a more relevant period. There are no publicly available data on land prices in different areas. Data from the in-house index that Savills used are available for sale, but we are advised that the index is not available for England as a whole (there are separate indices for London and the rest of the country). Nor is it produced for individual local authority

areas, because it is derived from a basket of hypothetical sites scattered across the country; the basket does not necessarily include sites in each local authority area, or enough sites in an area to construct an index. In other words, the Savills index does not provide good enough evidence to support a rigorous analysis that would be helpful to our present purpose.

- 3.11 To sum up, the new analyses provided by Savills add nothing to the evidence on market signals for Cambridge and South Cambridgeshire. The facts remain as set out in the 2015 Further Evidence report.

4 AFFORDABLE HOUSING

4.1 The Further Evidence report estimated that, if housing delivery met the objectively assessed housing need over the plan period, South Cambridgeshire would be able to meet its affordable need in full but Cambridge City would not. The report noted that, in line with the PPG and Inspectors' decisions, affordable need was not a component of the OAN which the OAN should include in full. Rather, affordable need is a separate consideration, which may lead Councils to increase provision targets above the OAN. Accordingly, the City Council should consider whether its target (requirement) should be uplifted in order to pay for more affordable housing. The report advised that the answer would depend partly on the city's development capacity and the viability of market housing, but realistically such an increase in provision might undermine housing development in other parts of the housing market area; and it would probably not reduce the local shortage of affordable housing.

4.2 In relation to Cambridge and South Cambridgeshire, a number of objectors maintain that the OAN or the plan target should be higher so that it can support more affordable housing. These views are a matter of judgment rather than analysis, and indeed objectors do not challenge our earlier analysis or add to it. But many Inspectors' findings, including those for Eastleigh, Uttlesford and Brighton and Hove quoted earlier, support our judgment that the appropriate adjustment should be modest and realistic. Since the Further Evidence report was written two further Inspectors reinforced this point, explaining that neither the OAN nor housing targets can or should meet affordable need in full. Thus, the Stroud Local Plan Inspector in November 2015 found:

'The need for affordable housing is certainly a policy consideration that could influence housing targets, particularly in view of affordability issues, but it is distinct from the overall objective assessment of housing need, since the methodology and numbers are not compatible. Although a modest increase in the overall housing requirement could be considered, to seek to deliver all the affordable housing needed through the provision of market housing would result in unrealistic and undeliverable rates of housing development.'

4.3 More recently in the Willersley appeal decision (APP/F1610/W/15/3121622) on 23 February 2016, the Inspector commented as follows on the appellant's case that the area's affordable need should be met in full:

'There are a number of critical shortcomings with this approach... Firstly, it does not reflect the PPG methodology for Full Objectively Assessed Need (FOAN). It is, in my view, flawed in seeking to assume that affordable housing need has to be met in full. As such the appellant has conflated the first two bullet points at paragraph 159 of the NPPF which distinguish between firstly meeting household and population projections and secondly addressing the need for all types of housing. This approach is reflected in the clear distinction in the methodology for FOAN in the PPG at Section 2a which

considers FOAN (including affordability) and then affordable housing need as separate exercises.

Secondly, the appellant's approach pays little regard to the actual underlying need and whether there is a need to increase the demographic and jobs-led elements of a FOAN. Consequently, in looking at the matter the other way round, the appellant's approach would result in a doubling of the agreed demographic and jobs-led scenario in the NMSS report to the extent that there would be such a magnitude of change that it would affect demographic behaviour in the District. That is in direct conflict with the FOAN methodology in the PPG.

In addition to the implications for demographic behaviour (and consequently sustainable development in the district), there is scant evidence before me that the appellant has carried out any serious consideration of other relevant matters associated with their suggested approach. These include the cumulative effect of such provision on the wider housing market, its achievability and practicality, and alternative options for increasing affordable housing delivery.'

- 4.4 For the same reasons set out above, we disagree with the view that the overall provision target for Cambridge City should aim to meet a realistic proportion of the affordable need, rather than meet that need in full.

5 SUMMARY

- 5.1 In the submitted Local Plans, proposed housing requirements are based on objectively assessed need of 19,000 net new dwellings for South Cambridgeshire and 14,000 dwellings for Cambridge over the plan period 2011-31. These figures were based on the Cambridgeshire Sub-region SHMA (2013). The PBA Further Evidence report (2015), provided additional analysis in response to the Inspectors' questions and which raised the objectively assessed need in South Cambridgeshire to 19,337 net new dwellings which was rounded upwards to 19,500 dwellings by South Cambridgeshire in their Proposed Modification (December 2015).
- 5.2 This paper clarifies and expands aspects of the Further Evidence report in response to representations received. It covers three issues: household formation rates, market signals and affordable housing need. It does not comment on other issues which were raised by representors but not by the Inspectors.
- 5.3 In relation to household formation rates, the analysis above supports the conclusion of the Further Evidence report, that there is no justification for upward adjustment to the CLG 2012 household formation rates. At national level those rates provide the best available view of future household formation, as stated in the PPG and confirmed by authoritative studies and recent Inspectors' findings. At local level the evidence from formation rates does not provide robust evidence on the balance of the market.
- 5.4 As discussed in Section 3 above we do consider that both Cambridge and South Cambridgeshire have supply-constrained housing markets, and therefore the 'starting point' demographic projections understate future housing need and should be adjusted upwards. But to make this adjustment we adjust the housing number directly, rather than amend household formation rates. One reason for this is that formation rates are an unreliable indicator of housing market balance, because it is too much influenced by other factors, as discussed above. Another reason is that in real life, supply constraints suppress net in-migration as well as household formation rates. Therefore, even if formation rates did provide a measure of market balance it would be an incomplete measure.
- 5.5 As regards market signals, there is nothing in the representations received to contradict our earlier analysis. The facts remain as set out in the 2015 Further Evidence report. Therefore in our judgment, that the appropriate market signals uplift is 30% for Cambridge and 10% for South Cambridgeshire, also remains the same.
- 5.6 Finally turning to affordable housing need, a number of objectors maintain that the OAN or the plan target should be higher so that it can support more affordable housing. These views are a matter of judgment rather than empirical based analysis, and indeed objectors do not challenge our earlier analysis or add to it. We have explained in our Further Evidence report that in our judgment an adjustment to address affordable housing need is not appropriate. Nothing in the objections suggests to us that we should reach a different judgment.

APPENDIX A MICKLETON APPEAL DECISION

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STROUD LOCAL PLAN INSPECTOR'S REPORT

APPENDIX C

CHARNWOOD LOCAL PLAN INSPECTOR'S REPORT



Appeal Decision

Inquiry opened 4 August 2015

Site visit made on 13 August 2015

by D R Cullingford BA MPhil MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 23/09/2015

Appeal Ref: APP/F1610/A/14/2228762

Land to the east of Broad Marston Road, Mickleton, Gloucestershire, GL55 6R9

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
- The appeal is by Gladman Developments Limited against the decision of the Cotswold District Council.
- The application (ref: 14/02365/OUT and dated 27 May 2014) was refused by notice dated 20 October 2014.
- The development proposed is described as an outline application for 'residential development (up to 90 dwellings), access, parking, public open space, landscaping and associated infrastructure'.

Summary of Decision: ~ The appeal is allowed, subject to conditions.

Procedural matters

1. Although this 'urban development project' falls within the descriptions set out at paragraph 10b of Schedule 2, exceeds the thresholds in column 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011, the Screening Direction issued by the Secretary of State on 21 July 2014 indicated that the scheme would not entail development in a 'sensitive' area and would be unlikely to have any significant environmental effect, bearing in mind the criteria set in Schedule 3 to the Regulations. Consequently the scheme is not EIA development and an Environmental Statement is not required. The Direction concurs with the Screening Opinion issued by the Council and dated 27 November 2014. Nevertheless, the application was accompanied not just by a:

- A Planning Statement, including an Affordable Housing Statement,
- A Statement of Community Involvement, and
- A Design and Access Statement.

But also by:

- A Landscape and Visual Assessment,
- An Arboricultural Assessment,
- An Ecological Appraisal,
- Plans and illustrations for the 'green corridor',
- Ecological Surveys relating to bats and great crested newts,
- An Archaeological Desk-based Assessment,
- An Archaeological Geophysical Survey,
- An Archaeological Evaluation,
- A Heritage Assessment,
- A Transport Assessment and Travel Plan,
- A Flood Risk Assessment and Foul Drainage Strategy,
- An Agricultural Land Quality Assessment,

- An Air Quality Assessment,
- An Energy Assessment,
- A Sustainability Assessment, and
- A Socio-economic Sustainability Statement.

Reasons

The site and surroundings

2. Mickleton is a village of some 750 households at the foot of the scarp slopes at the northern end of the Cotswold Hills. It lies at the edge of the AONB, beneath Hidcote Manor and gardens and just to the south west of Meon Hill, spreading into the flat fertile lands that form the Vale of Evesham. The place is listed in the Domesday Book and the old centre is clustered around the High Street, Chapel Lane and Hill Lane beneath the Parish Church of St Lawrence and the Manor House. This is the core of the Conservation Area where Cotswold Stone (of the hills) and thatched black-and-white buildings (of the Vale) jostle for position around the tiny green beside the Three Ways House Hotel. There are 37 Listed Buildings here, of which the Church, Medford House and its garden walls are Listed as Grade I. Newer estates spread to the south and north, though the scarp slope within the Conservation Area to the east is largely free from such development. Much of those estates appear to cover land that once accommodated orchards, nursery gardens or glasshouses, including the oddly divorced and mainly post War estates at Granbrook Lane. The same appears to apply to the 2 schemes recently granted planning permission involving up to 80 dwellings at Canada Lane (to the north, 13/03539/OUT) and some 70 dwellings at Arbour Close (to the south, 13/04237/OUT).
3. The village still has a Post Office, a general food store, a renowned traditional butcher, a garage, an ATM and a farm shop. There is the King's Arms and the Butcher's Arms and the Three Ways House Hotel: there is church and chapel and a modern primary school: there are sports facilities, a playing field and a play area: there are clubs and societies, including the Pudding Club which meets at the hotel. There is a regular, if limited, bus service through the village connecting Moreton-in-the-Marsh and Stratford-upon-Avon; it might provide for commuters into Stratford but to nowhere else and it might provide day-time connections to higher order places nearby; there is also a 'Hedgehog Community bus'. The nearest railway station is at Honeybourne, 3 miles away.
4. Such characteristics have been assessed in the context of the emerging Local Plan and Mickleton is ranked 13th out of the 17 settlements (other than Cirencester) identified in the consultation document as sufficiently 'sustainable' to accommodate additional development. Although employment is limited and other than by car-borne commuting restricted, the small Seyfried Industrial Estate to the north of the village offers some local job opportunities, as do the businesses in the village itself. True, neither the mooted business development envisaged as part of the Canada Lane scheme or the doctor's surgery at Arbour Close now appear likely to materialise. But Mickleton, along with Blockley and Wilersey, is described as forming a cluster of villages around Chipping Campden so that, collectively, employment and higher order services (such as secondary education, a doctor's surgery, banking and additional leisure facilities) are within reasonably easy reach. Hence, the village is identified as suitable to make a reasonable contribution to the overall District housing requirement, without compromising the environmental constraints evident elsewhere, including at Chipping Campden.

5. The site itself is a flat expanse of good arable land that wraps around the school and the cul-de-sac at Sovereign Close and extends north westwards into the countryside beyond the rear gardens of the dwellings in Back Lane. It amounts to some 8.4ha. Hedgerows and some remaining trees enclose the north eastern and north western boundaries: the remnants of derelict agricultural buildings, immersed in vegetation and shrouded by trees, enclose the south western edge beside the single track Broad Marston Road, though a wide gap in the foliage here serves as an entrance into the field: ponds, fed by a ditch, lie in the south western corner, ostensibly (but almost imperceptibly) 5m lower than the north eastern extremity: along the south eastern boundary are the fences and hedges of the dwellings in Back Lane. The whole of the village intervenes between the site and the AONB, so that the site is seen in the context of the adjacent estates and separated from the attractive designated landscape to the east.
6. A public footpath crosses the site and paths run along the southern boundary to the Heart of England Way or through the play area and the village to Baker's Hill and beyond. There are views across the site to Meon Hill and from the site to the church spire, seen against the scarp slope of the Cotswold Hills. But views across the flat vale soon peter out amidst successive envelopes of field hedges and boundary trees.

The proposal

7. The proposal is made in outline with all matters except the means of access reserved for subsequent approval.
8. The access arrangements entail the provision of an estate road 5.5m wide between footways 2m wide connecting to Broad Marston Road north of the school and the dwellings at Sovereign Fields and curving through the appeal site. Broad Marston Road would be widened between that new access and the entrance to Sovereign Fields forming a carriageway 5.5m wide with a single footway 2m wide along its north eastern edge.
9. The scheme envisaged is illustrated by a revised 'development framework plan'. An indicative layout is no longer suggested, although the scheme remains one for some 90 dwellings to be served by a new estate road. The proposal would accommodate space to expand the school and to provide new sports pitches adjacent to the existing village playing fields, all enveloped by swathes of 'green space', buffer planting, a SUDS balancing pond and retained field hedges. The overall density would be fairly modest at about 25dph. About 4.3ha (just over 50% of the site) would be laid out as some form of 'green space', including sports pitches, landscaping and buffer planting. The footpath across the site is shown as being enveloped in a wide, landscaped 'greenway' orientated towards the spire of St Lawrence's Church. Swathes of space would also accommodate the footpaths beside the gardens behind Back Lane and a new 'greenway' around the periphery of site.
10. A mix of dwelling types and sizes is proposed, including the occasional 2.5 storey property positioned at particular focal points; designs and materials are intended to reflect those evident in the village. The project would also deliver 50% of the homes (that is up to 45 properties) as 'affordable dwellings'. That provision would reflect the aspirations indicated in the explanations attached to policy 21 of the adopted Local Plan and the Affordable Housing SPD.

11. A signed and dated section 106 Undertaking would provide for the maintenance and management of the open space and playing fields through the provision of a 'management plan', to be submitted to and approved by the Council, and covering not just the management objectives, but also the means of funding the works involved. A contribution of £46,260 would be made towards the costs of creating, implementing and monitoring a sustainable Travel Plan designed to encourage non car-borne travel. A primary education contribution of some £263,070 (though dependent on the number of 'qualifying' dwellings eventually erected) would be offered to provide for the remodelling or upgrading of the local primary school and, similarly, a secondary education contribution of some £240,732 would provide for any necessary upgrading of Chipping Campden School. A sum of up to £17,640 would be offered to improve library facilities at Chipping Campden and a sum of £13,207.60 would be available to improve the Meon Medical Centre in Stratford-upon-Avon. In addition, a sum of £250,000 would be offered as a contribution towards providing a community building on land, made available for 3 years, to accommodate just such a structure: £2,000 would be offered to provide secure cycle stands around Mickleton: £3,000 would be made available to research potential pedestrian and cycle schemes that might enhance the connectivity of the site.
12. Suggested conditions would ensure that the scheme would be implemented as intended and that no more than 90 dwellings, 50% to be affordable units, would be erected along the lines indicated in the 'development framework plan': that the reserved matters and other details (including hard and soft landscaping and boundary treatments) would be submitted to the Local Planning Authority for approval: that foul and surface water drainage systems would be installed and controlled: that a Construction Management Plan (including hours of operation) would be devised and implemented: and that an Ecology Management Plan for the open space, detailing its layout, management and maintenance, would be submitted to the Local Planning Authority for approval.

Planning policy and the main issues

13. The Development Plan currently consists of the 'saved' policies in the Cotswold District Local Plan (2006), a document designed to conform over the period 2001-2011 with county-wide and regional plans long since revoked. A new Local Plan is emerging and has reached a stage in the consultation process; a Regulation 18 *Consultation: Development Strategy and Site Allocations* document having been published in January 2015. As yet a response to that consultation is awaited and the details of the mooted policies and proposals might well undergo alteration.
14. No Development Plan policy is cited in the one remaining reason for refusal, though policy 19 is referred to in proofs of evidence and statements of case. That policy aims to restrict development beyond 'development boundaries' to schemes 'appropriate to a rural area', provided that such projects would, amongst other things, relate well to existing development, only result in new-build open market housing that would help to meet the social and economic needs of rural residents, not damage existing patterns of development, not materially increase car-borne commuting and not significantly compromise sustainability. As 'development boundaries' are only identified for the 9 principal settlements (a list that does not include Mickleton), in addition to Cirencester, the whole of Mickleton lies beyond any 'development boundary' and all development within or without the settlement must be 'appropriate to a rural area' and satisfy the relevant constraints of policy 19. It is clear from the reasoned justification (particularly paragraph 3.3.19, but

also from the reference to paragraph 15 of the Annex in the superseded PPS7 and the explanation that 'the numbers involved are likely to be very small') that the policy is intended to be very restrictive; apart from replacement, sub-division or conversion, all new dwellings beyond 'development limits' must be either 'affordable' or encumbered by an appropriate occupancy condition. Indeed, the policy was devised to conform to a strategy where all 'new-build open market dwellings' beyond 'development boundaries' were deemed to be unwarranted.

15. It follows that the appeal scheme must contravene the requirements of policy 19. But, the policy is time-expired, conforms to a superseded strategy, fails to reflect the advice in the Framework (NPPF) in severely restricting rather than significantly boosting the supply of housing and conflicts with the emerging strategy now identifying Mickleton as one of 17 settlements in the District (other than Cirencester) suitable to accommodate additional dwellings. Moreover, adhering to the provisions of policy 19 in relation to the appeal proposal cannot be consistent with the recent permissions allowing 80 dwellings at Canada Lane and 70 homes at Arbour Close. In those circumstances, policy 19 can only be regarded as out-of-date. And, of course, the emerging Local Plan has not yet reached a stage where its mooted policies might reasonably serve as 'replacements'.
16. The 'legal' suggestion that policy 19 (or some of it) remains 'up-to-date' because elements chime with the Core Principles or other advice in the Framework is, I think, flawed. First, the policy criteria must logically be applied in the context of the policy, rather than as independent requirements unfettered by the carefully scripted scope of the policy itself. Second, the content of those criteria (requiring schemes for open market housing to relate well to existing patterns of development, to add little to car-borne commuting and to be 'sustainable', for example) has relevance not because it relies on the remnants of policy 19, but because it chimes with, and is endorsed by, the guidance in the Framework. Third, I disagree that the policy must imply open market housing to be appropriate to a rural area in order to engage with such development at all. The policy, as written, does engage with open market housing. But it insists that for such development to be 'appropriate to a rural area' it must be created by the replacement, sub-division or conversion of existing buildings; everything else is intended to be encumbered by some form of occupancy condition or to be offered as affordable housing.
17. Given that policy 19, the only policy cited as relevant, is 'out-of-date', the Development Plan can have little direct bearing on the determination of this appeal. Instead, as paragraph 14 of the Framework indicates, the proposal must be considered in the context of the presumption in favour of sustainable development and permission granted unless tests derived from specific policies in the Framework (or material considerations) indicate otherwise or any adverse impact of granting permission would significantly and demonstrably outweigh the benefits of the scheme when assessed against the Framework taken as a whole. Those are the tests that I apply here.
18. In addition, the appellants claim that a 5-year supply of deliverable housing land still cannot be demonstrated. There is no dispute that some 3045 dwellings would be likely to be delivered over that period. Rather, the dispute relates to the housing likely to be required and to the magnitude of the 'objectively assessed need'. Estimates range from 380dpa for the Council through 500dpa for the appellants to an 'illustrative' 860dpa for estimates incorporating some noticeable

redress in 'affordability' ratios. What might a reasonable estimate of the 'objectively assessed need' for housing and the housing requirement entail here?

19. In those circumstances, and from all that I have heard, read and seen, I consider that this case turns on:
- i) the level of 'objectively assessed need' for housing that might be reasonable,
 - ii) the requirement for, and the provision of, housing over the next 5 years,
 - iii) the requirement for, and the provision of, affordable housing,
 - iv) the impact of the scheme on amenity, on the landscape and on the character of Mickleton,
 - v) the overall planning balance in relation to the economic, social and environmental dimensions of 'sustainable development'.

Objectively assessed need

20. The Guidance (NPPG) indicates that establishing the future need for housing is not an exact science and that no single approach will provide a definitive answer. However, the approach suggested follows several discrete steps. The latest household projections are to provide the starting point adjusted, if necessary, to reflect any local demography or household formation rates not captured in past trends, such as formation rates suppressed by any under-supply or worsening affordability; similarly, migration levels may be affected by changes in employment growth or a one-off event and the demographic structure may be affected by local circumstances. The results might be adjusted to reflect appropriate market signals, to be assessed by appropriate comparisons and longer term trends (both in absolute levels and rates of change) entailing such indicators as land and house prices, rents, affordability, rates of development and overcrowding. It is explained that a worsening trend in any of those indicators could require an upward adjustment to housing numbers. The likely change in job numbers (based on past trends or economic forecasts) should be assessed and related to the forecast working age population in the housing market area (taking account of migration assumptions) to estimate the potential requirement for additional dwellings. In addition, an increase in the total housing figures should be considered where it could help deliver the required number of affordable homes.
21. As indicated above, the purpose of addressing the 'objectively assessed need' for housing here is to arrive at a reasonable estimate of the housing requirement to set against the agreed supply of dwellings over the next 5 years. In the absence of a tested Framework-compliant figure in an up-to-date Development Plan, the *Hunston* judgement indicates that the requirement should reflect the full objectively assessed need over the 5 year period. Much in the 'standard methodology' set out in the PPG is to be applied across a housing market area invoking the 'duty to cooperate' (as a means of addressing market-wide and region-wide processes) to resolve a range of inter-locking assumptions, involving migration flows, patterns of employment growth and the like. It is simply not possible to agree cross-border flows, commuting patterns or how to accommodate labour force movements in isolation from the other 'members' of the housing market area, from which it follows that the 'standard methodology' cannot easily be applied accurately in the context of a section 78 appeal; to do so must entail some fairly heroic assumptions. Indeed, the PPG implies that a more appropriate place to normally consider such matters is in the context of a local plan, for the

advice is clearly directed towards 'plan-making' rather than 'decision-taking'. For those reasons, it seems to me that the results of the current exercise should be treated with a degree of circumspection. While they might provide a broad range in which a reasonable 'objectively assessed level of housing need' might lie, they should not, in my view, be taken to identify what the 'objectively assessed level of housing need' might actually be. That exercise must await the sort of testing and wider considerations applicable to assessing the soundness of the new Local Plan that eventually emerges here.

22. Nevertheless, the assessment undertaken for the Council has been commissioned to provide advice as to what the 'objectively assessed need for housing' might be in the context of the emerging Local Plan, applies a methodology common to other Gloucestershire Councils (the Forest of Dean and Stroud) in line with the Guidance and does what it can to accommodate County or market-wide circumstances. The assessment undertaken for the appellants is rather more confined to the District and does not follow the 'standard methodology', though that is not an inherent flaw.
23. Both assessments concur that an average of some 320dpa would be required to meet the demographically induced housing needs of the District up to 2031. But, the assumptions behind that concurrence are quite different. For the Council the 2012-based projections are adjusted by 'smoothing' out migration levels to reflect the last 10 years rather than rely on the trends derived from the steeper falls experienced during the recent recession; that seems reasonable to me. For the appellants, the 2012-based projections are adjusted by assuming that the household headship rates for the 25-34 year old cohort departs from the trend projected to achieve a level last attained in 2001 by the end of the plan period. And (though with less impact) that the household headship rates for the 35-44 year old cohort reverts to the modestly increasing trend evident in the 2000s.
24. I fear that both those assumptions are baseless. The proffered explanation that past trends will return as constraints caused by the recession and housing unaffordability ease, fails to address either the evident onset of declining headship rates some 8 years before the 'crash' (during which time the markets, awash with mortgage finance, staged a mini house building boom) or the foreseeable continuation of further severe constraints manifest in the added burden of financing higher education, the absence of previously available welfare benefits and the post-recession tightening of mortgages. Nor is it clear why the headship rates for the 25-34 year old cohort should return to the highest level achieved in the last quarter of a century, which is what the level attained in 2001 actually is. And, since the only credible explanation for the adjustments to the headship rates in the 35-44 year old cohort is to reflect the 'cohort effects' of the 25-34 year olds, the adjustment must be equally unwarranted. In any case, it is not clear that either of these adjustments reflects any local demographic departure not captured in past national trends, as the Guidance suggests.
25. In the 'standard methodology' the next step is to consider whether the results might be adjusted to reflect appropriate market signals. Since the graphs for all the indicators and comparators considered follow similar patterns, no adjustment is made by the Council. However, as the Guidance indicates that 'absolute levels' should also be taken into account, the appellants argue that the markedly higher house prices and the noticeably worse measures of affordability (for example) that have persisted in the District warrant an 'uplift' in the provision of dwellings. On the basis that the median house price to income ratio in Cotswold should fall from

11.6 to 7 or even further to about 5.5 (reflecting 'improvements' advocated for England and assuming a price elasticity of -2 in relation to the total housing stock, as derived from the 'Reading model'), it is suggested that an additional 150-390dpa should be required over the plan period. Those additions are added not to the basic demographic requirement, but to the jobs-led assessment, without correcting for any potential double counting. That may be a mistake but, to be fair to the appellants, I think that there is an 'illustrative' quality to these calculations.

26. Nevertheless, even as an 'illustration', I consider that those scenarios lack reality. A house in the Cotswolds costs more than other places at least partly because it offers attractions that do not exist elsewhere. The same applies to the Chilterns (also offering swathes of AONB landscape and where similar differentials exist) and to Kensington and Chelsea (currently the place where the ratio of lower quartile prices to lower quartile incomes is the highest in the land). Because location is an integral characteristic of any dwelling, there are numerous geographical discontinuities in housing markets. That makes it inappropriate (and very misleading) to apply a price to stock elasticity derived from national (and possibly regional) models to predictions purporting to illustrate such effects within the confines of one modest District. Indeed, as the lower quartile house price to income ratio for Cotswold has remained at a fairly consistent level above that for Gloucestershire and England for the last 15 years or so, it may well be that the absolute differential elicited here is an expression of just such a geographical discontinuity. (The lower quartile house price to income ratio for Cotswold has remained roughly 1.4-1.6 times above that for Gloucestershire - it now stands at about 1.5 - and roughly 1.5-1.9 times that for England - it is currently about 1.7 - throughout the period 1997-2013.) The implication is that the price and affordability of houses in Cotswold has not been especially responsive to supply (which is one of the main implications of the Reading model nationally). It follows that a significant increase in the stock of houses in Cotswold would be likely to result, not in a noticeable decrease in house prices or improvements in affordability, but in new residents with the wherewithal to pay the prices sought. For those reasons I think that the issue of 'affordability' requires a different approach (which I address later). In my view, the evidence adduced does not demonstrate that market signals warrant an increase in the objectively assessed need for housing in the District of Cotswold.
27. The next step in the 'standard methodology' is to allow for the likely change in jobs and whether that might require the provision of additional dwellings. Forecasts are applied from Oxford Economics and Cambridge Econometrics. But, they give dramatically different results everywhere except for Cotswold District and even there the results are derived from dramatically different assessments of the local economy. Within the County an 'excess' of 7,100 dwellings contrasts with a need for 6,100 additional homes: in the 'joint core strategy' area (Gloucester, Cheltenham and Tewkesbury) the excess varies from 9,500 to just 600 homes: in the other Districts significant surpluses conflict with equally significant shortages: only in Cotswold do both 'forecasters' predict a need for additional dwellings and only in Cotswold are those predictions within the same 'ball-park' (3,800 or 2,900 new homes, respectively). But, that apparent concurrence is derived from growth driven by completely different sectors of the economy; significant growth in construction and financial and business services is forecast for one against growth in government services, accommodation and food for the other. The implied perception of the local economy could hardly be more different. Clearly, it is necessary to adopt some form of *modus operandi* in

dealing with such conflicting and contradictory predictions. And, it is the response to the inherent uncertainty created by these job forecasts that is the source of the main difference between the competing 'objective assessments of housing need'.

28. For the Council, the forecast for the District is linked to the forecast for the County by interpreting the 'excess' of 7,100 dwellings predicted as a need for no further homes, but halving the predicted need for 6,100 additional homes on the basis that there must be a 50% chance that the other forecast might materialise; the resulting 3,050 additional dwellings is then distributed between the Districts in accordance with the 'matching' predicted share of the 'additional' jobs to give an additional requirement for Cotswold of some 1,300 dwellings, or about 65dpa. This is clearly somewhat arbitrary. But, it does represent a way to acknowledge the uncertainty created by the conflicting predictions and it does have some regard for the circumstances pertaining within related labour and housing markets, at least at the County level. (I realise that the Council have based their future provision of industrial and employment land on these job forecasts, but that does not, in itself, render the predictions inherently more reliable; and, in any case, I think that rather different considerations relate to such provision.) Adding the 'jobs-led need to the demographic 'objective assessment of housing need' results in a requirement for about 385dpa, presented as a need for 380dpa.
29. For the appellants the average of the 2 competing predictions for additional dwellings (3,350) is added to the adjusted demographic assessment to achieve a requirement of 10,000 additional homes over the plan period, or about 500dpa, of which some 180dpa would cater for job increases. However, I think that such a simple approach is flawed. First, it places unwarranted reliance on the numerical concurrence between the 2 competing forecasts without addressing either the completely different sectors on which such growth is based or the substantial divergence between the predictions that occurs everywhere else. Second, it implies a sustained average increase over the period 2014-2031 in the household population of some 965ppa. That is roughly 2½ times the average increase achieved in the past (1991-2014) and, although such a level of development has been achieved once in the past 25 years, no evidence is adduced to demonstrate that it could be realistically sustained over the next 20 years. It may represent a 'significant boost to the supply of housing' but, in the absence of compelling evidence, it seems unlikely to be achievable to me. Third, almost all the growth predicted for Cotswold is assumed to require additional dwellings without recognising that there may be a good chance that adjacent Districts and nearby centres of employment might contain an 'excess' of homes. I think that this unrealistically ignores the interconnectedness within and between housing and labour markets. As a consequence, there would be a chance that the assessment would be predicated on failing to properly utilise existing infrastructure and dwellings and, thereby, be strategically unsustainable.
30. For all those reasons I prefer the estimate, at 380dpa, put forward by the Council as the 'objective assessment of housing need'. And, although I realise that the Inspector at the Stroud EiP initially criticised the assumptions used to allow for the additional jobs forecast as 'somewhat arbitrary', further analysis there has now led to the acceptance of a practically identical 'objective assessment of housing need', the difference being less than 2%. There may thus be good reason to prefer the results of a similar methodology in a neighbouring authority. (Very fairly, the other figures presented by the appellants replicating the previous rates of job growth - over the period 1991-2013 - are put forward as illustrations rather than as estimates of any 'objectively assessed need', so I do not need to address them

here.) I consider the need for affordable housing and whether an increase in the total housing figures might help to deliver the need identified later.

The 5-year housing supply

31. As it is agreed that some 3045 dwellings would be likely to be delivered over the next 5 years, it follows directly that the Council can demonstrate a supply of housing, with a 20% buffer, to satisfy the 'objectively assessed housing need' over the next 7.8 years. The appellants demonstrate that a supply of nearly 4.7 years would exist even with their own need assessment of 500dpa. But that shortfall depends on applying the 20% buffer in response to a 'persistent under-delivery' in the supply of housing. In spite of agreement between the parties and numerous appeal decisions by my colleagues and the Secretary of State applying just such a 20% buffer, it seems to me that the circumstances that currently apply do not support such a stance now. As clearly indicated in the Bloor Homes judgement (*Bloor Homes East Midlands Limited v SoSCLG [2014] EWHC 754 (Admin) at [122]*), 'The word 'persistent' seems to imply a failure to deliver the required amount of housing that has continued or occurred for a long time, though not necessarily through an authority's deliberate default.' The evidence available here, and set out below, does not demonstrate such a persistent failure.
32. The contrary view seems to depend upon seeking to match comparisons between the annual delivery of dwellings and the annual average requirement. But, there is no requirement (of any kind) that the delivery of dwellings should always match the annual average provision. Indeed, such an expectation would be unrealistic. Uniform distributions of dwelling delivery do not even occur at a national scale, let alone within the confines of a modest District. The provision of housing comes in 'lumps' and it follows 'cycles'. So, variations about the annual average requirement should be expected and periods of plenty, followed by periods of 'famine', should be accommodated in meeting what is actually required, namely the number of dwellings to be provided over the Plan period. Indeed, the PPG advocates as much. In assessing the 'local delivery record' a long term view is encouraged to accommodate cycles in the housing market and the advice is that past excesses can be taken into account to off-set any current under-provision.
33. In this case, the actual record of delivery over the period 1991-2014 set against the requirements prevailing at the time (the adopted Structure Plan, the Local Plan and the current 'objectively assessed need') indicate that the years when a shortfall occurred are matched by the years when a surplus was delivered (12 years to 11), a pattern that is only to be expected in comparing annual observations against an annual average. Moreover, there have been several periods when the cumulative delivery exceeded the cumulative requirement (during the 1990s and in the early 2000s), demonstrating that any under-delivery has not always persisted. And, although currently there is a cumulative shortfall against the cumulative requirements, it is very small (less than 2% in almost a quarter of a century) and is being reduced by annual surpluses achieved for each of the last 4 years. In my view, this situation cannot be described accurately as representing the 'persistent under-delivery' of the housing required. It is thus inappropriate to apply the 20% buffer now.
34. With a 5% buffer the agreed supply of housing would be sufficient to satisfy the 'objectively assessed housing need' of 380dpa over almost the next 9 years and the 500dpa requirement suggested by the appellants over a little more than the next 5 years. Hence, I consider that a 5-year supply of deliverable housing land is demonstrated.

35. The SHMA (2013) identifies an annual 'overall' need for affordable housing within Cotswold District as 574dpa. This figure is derived largely from following the methodology outlined in the now superseded *Strategic Housing Market Assessments: Practice Guidance 2007*. The number of households currently in some form of housing need is estimated together with those newly arising households likely to be in need to set against the current and future supply of affordable dwellings; the number that cannot be housed by the estimated supply is, essentially, the need for additional affordable housing. The 2007 Guidance indicated that households unable to afford suitable accommodation on the open market were those unable to meet lower quartile accommodation costs from 25% of their gross income, excluding what were then, 'housing benefit' payments, the rationale (not entirely understandable) being that a higher proportion of income devoted to housing costs could induce 'poverty' and that 'housing benefit was only paid to households who would otherwise be unable to afford their housing'. The current Guidance retains the 'entry' level at the lower quartile of accommodation costs, but it does not insist that those costs should be met from no more than 25% of household income nor does it explicitly exclude 'local housing allowance' (that now replaces housing benefit) as a source of income.
36. The draft version of the current Guidance emerged in August 2013 as the SHMA was being written and, perhaps in anticipation of the impending changes, the SHMA indicates that other estimates of the need for affordable housing might be legitimate. It shows that if payments for accommodation at lower quartile prices were to be taken from up to 35% of gross income and if the annual availability of lettings supported by 'local housing allowances' were to be added to the supply of affordable dwellings, then the annual need for affordable homes would be reduced to 130dpa. The comments contained in the SHMA are instructive. It states that *'The figure of 574 remains the overall need figure, because it is calculated in accordance with the approach [then] set out in the Practice Guidance and is therefore comparable with historical estimates and figures derived elsewhere. However, the figure of 130 is more representative of the way that housing need is experienced in current market conditions, as acknowledged by stakeholders. This can be viewed as the core housing need in Cotswold'*. I interpret this to imply that the figure of 130 is more realistic and more reflective of local conditions. And, although more people might justifiably benefit from affordable accommodation, that justification appears to rest on superseded guidance and the 'luxury' of historical and geographical comparisons.
37. Clearly, an 'objectively assessed need' of 380dpa could provide 190dpa as affordable homes (well in excess of the 'core need') if all developments were to yield 50% as affordable units. Of course, that would be most unlikely, in spite of current policies; many schemes would be small scale and below any threshold likely to require provision and some would be subject to viability constraints. However, recent experience is that an annual average of 132 affordable homes was achieved from 2008/9-2012/13 with even greater provision made recently entailing an annual average of 160 affordable dwellings from 2010 to 2014. It is thus at least plausible that a realistic need for affordable housing, reflective of local conditions, could be achieved in the context of the estimated 'objective assessment of housing need'. It follows that the 'core need' for affordable housing does not necessarily require an increase in the 'objective assessment of housing need'.

38. However, that does not mean that provision for affordable housing would not be required in relation to the appeal scheme. The Planning Officer's careful report indicates that a local need is evident in Mickleton. Some 82 households with a connection to the District are registered for rented affordable housing in this and neighbouring parishes. And local studies indicate that the Chipping Campden sub-area, of which the Mickleton is a part, has a gross annual need for 11 affordable homes. Although the 2 permitted schemes at Canada Lane and Arbour Close should deliver some 73 affordable units, the 45 affordable dwellings that could materialise on the appeal site would provide for the annual local needs arising over some 4 years, or for a slightly shorter period if used to meet any existing shortfall.
39. Moreover, the provision of affordable housing seems to me to be one of the few effective ways (in the absence of Council housing) to address the housing affordability issues recognised by the Council itself as operating in the District. The fact that housing in the Cotswolds has always (within the range of the statistics) remained consistently more unaffordable than housing in Gloucestershire or England, for example, demonstrates that this is a place where a geographical discontinuity in the housing market operates, so that prices are likely to be irresponsive to supply and different mechanisms, entailing administrative and legal measures, must be used to provide the housing people need. The provision of affordable housing here would meet those requirements.

Amenity, landscape, character and agriculture

40. The site is a flat expanse of arable land beside the school and the cul-de-sac at Sovereign Close extending into the countryside beyond the rear gardens of the dwellings in Back Lane. The 'development framework plan' indicates that a swathe of open space some 40m wide would lie between the closest dwellings and the properties along Back Lane, so avoiding any overlooking and providing a potentially green and pleasant outlook from the small rear gardens there. Space would also exist to ensure that the dwellings of a similar scale and with similar rear gardens would line the entrance to the new estate road and back on to the dwellings in Sovereign Close, thereby safeguarding the privacy and prospect that existing residents might reasonably expect to enjoy. Some 93 2-way trips are predicted during the morning peak hour with a similar number (87 2-way trips) during the evening. Such limited traffic, just 2 vehicles every 3 minutes, could be easily and safely accommodated on the widened Broad Marston Road and traffic modelling demonstrates that, even with all the development likely to be delivered by 2019, there would be sufficient capacity along Back Lane and at the Chapel Lane and High Street junction. The Travel Plan, to be secured through the section 106 Undertaking, should reduce the number of single occupancy car trips. Hence, the scheme would not seriously impinge on the amenity of local residents.
41. The appeal site is seen as part of the flat fertile landscape spreading into the Vale at the edge of the village. It is quite well contained (as all agree) by hedges, foliage and trees and by the vegetation and fences of the adjacent school and back gardens. There are views across the site to Meon Hill, but views into the Vale soon peter out amidst successive envelopes of field hedges and boundary trees. Importantly, the site lies beyond the AONB and apart from the Special Landscape Area and, as such, is a rare piece of land in this District (just 20% or so) not specially designated within a distinctive or attractive landscape. It is also often seen with, and is perceived in the context of, the newer estates that spread to the south and north of the village. These estates separate the site physically

and visually from the Conservation Area and the village core while the whole settlement intervenes between the site and the AONB, divorcing it from that attractive landscape and, as indicated below, from its natural setting.

42. Those characteristics would ensure that the impact of this scheme upon the surrounding landscape would be limited and restricted. Of course, this flat field would be transformed into a 'suburban-like' estate. But all that would be evident from most vantage points beyond more than a field away would be a new edge to the village and, since that would be immersed in swathes of green space and foliage, the current estate-like edge would be much enhanced. Views across the site to Meon Hill would be altered, but the scheme would barely affect views from vantage points just beyond. From vantage points along the scarp slope, the new estate would only be glimpsed and even then (as I saw for myself from Bakers Hill) it would only be manifest as a sliver of additional rooftops behind existing buildings. The views and experience of walkers on the public footpaths across the site, or adjacent on Broad Marston Road, would be altered. But those paths already run beside, or within the ambience of, existing dwellings or the school. And, although the vista of open countryside would be postponed in striking north westwards across the site, the avenue of green space would herald the approach of fields and farmland or safeguard views of the church spire against the Cotswold Hills for the 'homeward' journey. Hence, I agree with the Planning Officer and the appellants that, with the landscaping and planting proposed, this scheme could be accommodated in this landscape without any significant adverse effects, as the Landscape and Visual Impact Assessment demonstrates.
43. Mickleton is not a 'linear' settlement. It originated as a cluster of dwellings around the High Street, Chapel Lane and Hill Lane huddled beneath the Parish Church and the Manor House. The assertion made in the *Gloucestershire Landscape Character Assessment (2006)* that it is 'aligned predominantly along the B4632' and 'is likely to have been a linear village that has since expanded' is wrong and is contradicted by all the available old maps, by the archaeological evidence and by the existing settlement pattern. Because the appeal scheme would be located adjacent to the newer estates spreading to the south and north of the village core, it would not impinge on the Conservation Area or any of the 37 Listed Buildings that contribute to the character of the place. On the contrary, it would be seen in conjunction with modern development and the links, landscaping and community provision indicated on the 'development framework plan' would serve to integrate the scheme in the pattern and social fabric of the village.
44. So, although the proposal would project some 200m into the countryside from Back Lane and about 100m from the school and Sovereign Fields, it would often be seen against modern development and appear commensurate with the existing estates. Indeed, it would mirror the projection of the permitted scheme at Canada Lane across the intervening 'ridge and furrow' field. It would not be located on the lower scarp slopes, but then neither are the dwellings in Back Lane or at Sovereign Close or on many of the new estates here. It is only the Conservation Area and the older parts of the village for which that could reasonably be described as an 'established pattern of development'. The widening of Broad Marston Road would alter the character of a narrow rural lane. However, permission for 2 dwellings on 2 separate plots opposite the appeal site would also alter the character of that lane, thereby reducing the incremental damage that might otherwise be attributable to the appeal scheme alone. For those reasons, I consider that the proposal would not seriously impair the character of this village.

45. The proposal would result in the loss of the 'best and most versatile' agricultural land; 5.7ha is indicated to be of grade 2 quality and 1.9ha is shown as grade 3a. The land is actively farmed and managed, it must contribute to the viability of a farming enterprise and it is a resource of inherent value. I agree with the Council and Cllr Hughes that such land should be safeguarded for future generations, if possible. Indeed, the Framework indicates that the economic and other benefits of the best and most versatile agricultural land should be taken into account and, where significant development of agricultural land might be necessary, poorer quality land should be used in preference to that of a higher quality. Neither the Framework nor the Guidance indicates what a 'significant development' might entail in this context. Clearly, the scale of the proposed development would be well below the 20ha 'consultation threshold'. And, the long-term impact might be even less significant as only half the site (about 4ha) would actually accommodate buildings, the rest being laid out as various forms of 'green space'. No evidence is adduced to show that the scheme could be accommodated on lower quality agricultural land and the 2 recently permitted schemes also entail the loss of the 'best and most versatile' land, even though I understand that none of it was of grade 2 quality. In any case, the loss of very good agricultural land must be set against the contextual setting of the scheme amongst the modern estates and the complete absence of almost all other constraints to development that affect so much of the land within Cotswold District. The restrictions imposed by the AONB and special landscape designations, by flood risks and by the presence of heritage assets mean that good use should be made of those few sites where such restrictions do not apply. In my view, that is the case here.

The planning balance

46. As indicated above, this scheme must be considered in the context of the presumption in favour of sustainable development. It should succeed unless tests derived from specific policies in the Framework (or material considerations) indicate otherwise or any adverse impact of granting permission would significantly and demonstrably outweigh the benefits of the scheme when assessed against the Framework taken as a whole. Is the scheme sustainable?
47. It seems to me that Mickleton itself is a reasonably sustainable place. It has a Post Office and a range of local shops: it has a garage, an ATM, 2 public houses and an hotel: there is church and chapel and a modern primary school: there are sports facilities, clubs and societies: and, there is a regular, if limited, bus service. It functions, as one of a cluster of villages around Chipping Campden so that, collectively, employment and higher order services (such as secondary education, a doctor's surgery, banking and additional leisure facilities) are within reasonably easy reach. Those characteristics have led the Council to identify the place as one of just 17 settlements suitable to accommodate additional housing.
48. The scheme would be sustainable too. It would lie adjacent to modern development at the edge of the village and would incorporate physical links, indicated on the 'development framework plan', physically connecting the new dwellings to the rest of the village while the Travel Plan would help to reduce the car-borne journeys that might otherwise occur. The project would contribute towards meeting the needs for market and affordable housing, providing for a mixed and inclusive community, as the Framework advocates. Moreover, the proposal would incorporate several measures to foster the integration of the new residents into the social fabric of the place; land would be made available for 3 years to provide either for the expansion of the school or for a community

building; open space would be provided to expand and enhance the existing provision and allow for off-street parking on part of the existing playing field; additional sports pitches would be provided. The green space and buffer planting would enclose this corner of the village enhancing its visual and environmental integration with the surrounding landscape without impinging on the setting of the AONB and offering the opportunity for ecological enhancement and new recreational pursuits. A SUDS balancing pond, an appropriate drainage scheme and appropriate contributions to the provision of other services and facilities would ensure that the scheme would not adversely impinge on existing infrastructure.

49. The proposal, together with the 2 permitted schemes, would expand Mickleton by roughly 30%. However, there is no evidence that such growth would be harmful or, given the social provision incorporated into the scheme, threaten community cohesion. On the contrary, there is some evidence that the new developments would result in more trade for the local shops, more customers for the local pubs and more support for the local school. And, although the provision of some 239 dwellings over the Plan period would be relatively high for what is in the adopted Local Plan a 'non-principal settlement', it would not be unique and would not appear to undermine any discernable settlement strategy exhibited in the current version of policy SP5 of the consultation document in the emerging Plan.
50. I consider, therefore, that this scheme would represent sustainable development in a reasonably sustainable place. Moreover, no conflict with a specific policy in the Framework has been demonstrated. Would any adverse impact of granting permission significantly and demonstrably outweigh the benefits of the scheme, assessed against the Framework as a whole?
51. I think that the adverse impacts of the scheme would be very modest. They would amount to the loss of the 'best and most versatile' agricultural land and the transformation of a field, crossed by footpaths, into a residential estate. For the reasons given above, the loss of this very good agricultural land would be warranted by the need to make good use of the limited supply of developable land unencumbered by the many restrictions that must apply in much of Cotswold District. And, although the scheme would itself project into the countryside beyond the village, the impact would be limited, being visually and physically contained in the landscape, such containment being reinforced by swathes of open space and 'buffer' planting.
52. The scheme would deliver several benefits. It would provide 90 dwellings within the next 5 years, boosting the supply of housing in a suitable and reasonably sustainable location. The new residents would be expected to support the social and economic sustainability of the place and add to the potential custom enjoyed by the local shops and services. The 'framework development plan' could provide the basis of a well-designed scheme, preserving important views and creating broad corridors of attractive green space with links to the village and the countryside beyond. Measures to manage the green space and to enhance ecological diversity would also be instigated, together with proposals to foster the social integration of prospective residents in contributing to the community and social life of the village. The scheme would also be likely to add to the economically active in Mickleton and, possibly, to about £2m of additional household expenditure. It would lead directly to the spending of some £9.25m on construction, the provision of some 86 jobs (or their full-time equivalent) over 3 years and indirectly to another 94 jobs. And, there would be a 'new homes bonus' payment of about £850,000.

53. Most importantly, the scheme would boost the supply of affordable housing by offering 50% of the units as affordable homes. That proportion is relatively high across the Country and it is unlikely to be achievable on all development sites or in relation to all developments. It is thus particularly important to utilise effectively those situations where such provision is possible. As I indicate above, I consider the provision of affordable housing to be one of the very few effective ways in which the 'affordability gap' evident in the District (and recognised by the Council) might be addressed.
54. For all those reasons, I conclude that the limited adverse impact of granting permission here would be significantly and demonstrably outweighed by the benefits of the scheme.

Other matters

55. Although not raised as issues at the Inquiry, several other matters affect the nature of the scheme or the conditions that might be imposed. First, although the site is in Flood Zone 1, it is flat and the development would increase surface water run-off. The submitted Flood Risk Assessment indicates how the discharge of surface water could be limited to green-field rates by installing a SUDS drainage scheme. The Environment Agency raises no objection, subject to the imposition of suitable conditions.
56. The foul sewage and the water supply systems involve infrastructure elements that are inadequate. The consultation response from Thames Water suggests that conditions should be imposed to require an assessment of the additional capacity that might be required and to indicate suitable connection points. However, there is a statutory duty to provide such connections under the requirements of the Water Industry Act 1991. Hence, there would be no need for planning conditions to duplicate powers available under other legislation, as the submitted notes confirm.
57. The submitted Ecological Appraisal demonstrates the presence of ponds, wet habitats and amphibians (though no protected species), the existence of a main Badger sett, the foraging of bats along the boundary hedgerows and the potential use of some trees by bats. As the ponds are to be retained, a 30m safeguarding zone maintained around the sett, badger pathways and forage areas accommodated, and the hedgerows and trees preserved, the scheme need not unacceptably impinge on any protected species or habitat and could accord with policy and the relevant Regulations. However, such compliance would depend upon the detailed management of the proposed green spaces and ponds, so that a condition requiring the submission of an Ecological Management Plan would be warranted.
58. An original reason for refusal, since withdrawn, related to the absence of an archaeological investigation of the appeal site, given the wealth of interesting finds uncovered in the vicinity, including those relating to prehistoric and Roman settlements at the former Meon Hill Nurseries site. However, a subsequent investigation has shown that there is no potential for unknown archaeological remains on the appeal site. Hence, there is no requirement for further archaeological work.

The Undertaking and conditions

59. The provisions of the signed and dated section 106 Undertaking are outlined above; they should comply with the tests set out in CIL Regulations 122 and 123.

The submitted 'CIL compliance statement' demonstrates that those tests are met, and supported by policies in the adopted Local Plan, with respect to the contributions towards primary and secondary education and to the library at Chipping Campden, all in accordance with policy 49. In a similar vein, the contribution to the Meon Medical Centre would ameliorate pressure on existing facilities due to the development. In addition, several elements of the Undertaking would be directed at providing specific facilities for the proposal (thereby not entailing payments that could be 'pooled') and be integral to the 'sustainability' of the scheme, a finding on which my decision depends. This would include contributions towards the costs of creating, implementing and monitoring a sustainable Travel Plan to promote non car-borne travel, to provide secure cycle stands and to explore the implementation of schemes to foster travel on foot and by bicycle.

60. Provision for the maintenance and management of the open space and playing fields through the preparation of a 'management plan' and the creation of a 'management company' would be vital to achieving the visual containment and the environmental enhancements fundamental to my decision. In addition, I think that the measures to foster the integration of the scheme into the social fabric of Mickleton are also integral to the nature of the proposal and the ethos it exhibits. This would include the offer to make land available for 3 years to provide either for the expansion of the school or for a community building and, if the latter, to contribute to its construction. This would be directly related to the development, 'reasonable' in relation to the scale of the scheme and 'necessary' to achieve the type and quality of the project intended. And, being specifically related to the village, it would not constitute a 'type of infrastructure' featuring in previous Obligations. I think that the requirements of the Regulations would be met.
61. As indicated above, the conditions are intended to ensure that the scheme would be implemented as intended. I have explained the absence of conditions relating to foul water drainage and archaeology. I need only add that, as the proposed access arrangements were deemed to be acceptable, further approval would not seem to be required; construction of the roads and the surface water drainage details would be subject to other legislation or other conditions. Also, I think that the operating hours of the construction should be controlled, in view of the proximity of the site to existing dwellings and this quiet rural location; a suitable condition is imposed. The need to undertake an investigation for potential contamination is mainly due to the presence of derelict structures towards the south western corner of the site. The reasons for imposing the other conditions are either explained elsewhere or are self-evident.

Conclusion

62. I have found that a 5-year supply of deliverable housing land is likely to exist, given the level of 'objectively assessed housing need' that I find likely to suffice. Even so, I consider that the provision of some 45 units (50%) as affordable dwellings would make an important contribution to addressing the 'affordability gap' evident in the District. The scheme would not seriously impinge on the amenity of local residents and, with the landscaping and planting proposed, it could be accommodated in this landscape without any significant adverse effects and without seriously impairing the character of the village. As the proposal would represent sustainable development in a reasonably sustainable place, and as its few adverse impacts would be clearly outweighed by the many benefits of

the scheme, I conclude that this appeal should succeed in accordance with the advice in the Framework, subject to the conditions listed in the attached schedule.

Decision

63. The appeal is allowed and outline planning permission is granted for residential development (up to 90 dwellings) including, access, parking, public open space, landscaping and associated infrastructure on land to the east of Broad Marston Road, Mickleton, Gloucestershire in accordance with the terms of the application ref:-14/02365/OUT (dated 27 May 2014) and the plans submitted therewith, subject to the conditions listed in the attached schedule.

David Cullingford
INSPECTOR

APPEARANCES
FOR THE APPELLANTS:

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Instructed by:
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He called

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Director, LPC (Trull) Limited

INTERESTED PERSONS:

Cllr Sue Jepson
Cllr Robin Hughes

Blockley Ward Counsellor
Sandywell Ward Counsellor and Chairman of
the Planning and Licensing Committee

DOCUMENTS

Document	1	Lists of persons present at the Inquiry
Document	2	Summary, proof and appendices ~ Ricardo Gomez
Document	3	Rebuttal proof ~ Ricardo Gomez
Document	4	Summary, proof and appendices ~ Timothy Jackson
Document	5	Summary and proof ~ Robert Hindle
Document	6	Appendices ~ Robert Hindle
Document	7	Summary and proof ~ Jason Tait
Document	8	Proof and appendices ~ Neil McDonald
Document	9	Rebuttal proof and appendices ~ Neil McDonald
Document	10	Summary, proof, appendices and photos ~ Andrew Miles
Document	11	Bundle of representations
Document	12	Inspector's index to the representations
Document	13	Further copies of representations
Document	14	Statements of Case: For the Council For the appellants
Document	15	Statement of Common Ground
Document	16	Letters of notification and circulations lists
Document	17	Letter from Counsellor Hughes

INQUIRY DOCUMENTS

ID01	Extract from NPPG; assessing housing need
ID02	<i>West Berkshire DC and Reading BC v DCLG [2015] EWHC 2222 (Admin) CO/76/2015</i>
ID03	Affordable home ownership, Cotswold DC
ID04	Housing need tables: comparisons between estimates for the Council and the appellants
ID05	Committee report updating the list of settlements suitable to accommodate housing
ID06	Development Strategy, 2014
ID07	Draft section 106 Undertaking
ID08	The settlement pattern of Mickleton; maps and archaeological evidence
ID09	<i>Bloor Homes (East Midlands) Limited v SoS and Hinckley and Bosworth BC [2014] EWHC 754 (Admin) CO/2334/2013</i>
ID10	Decision notice: outline permission for 1 dwelling on Broad Marston Road, 15/01556/OUT, 10 June 2015
ID11	Decision notice: outline permission for 1 dwelling on Broad Marston Road, 14/04961/OUT, 15 January 2015
ID12	Suggested conditions
ID13	Reasons why a condition related to potable water is unnecessary
ID14	Reasons why a condition related to foul drainage is unnecessary
ID15	CIL compliance statement
ID16	Council's opening submissions
ID17	Council's closing submissions
ID18	Appellant's opening submissions
ID19	Appellant's closing submissions
ID20	Signed and dated section 106 Undertaking

CORE DOCUMENTS

CD1 Application Documents

- 1.01 Application Covering Letter, Application Form and Certificates
- 1.02 Location Plan (including Application Red Line) (Dwg no: 2013-083/001 REV c)
- 1.03 Site Access (Dwg no: C13684-002)
- 1.04 Development Framework (Dwg no: 5932-L-01 rev G)
- 1.05 Planning Statement
- 1.06 Design & Access Statement
- 1.07 Landscape & Visual Assessment
- 1.08 Transport Assessment
- 1.09 Travel Plan
- 1.10 Ecological Assessment
- 1.11 Arboricultural Assessment
- 1.12 Foul Drainage Strategy
- 1.13 Flood Risk Assessment
- 1.14 Air Quality Screening Assessment
- 1.15 Noise Screening Assessment
- 1.16 Heritage Statement
- 1.17 Archaeological Desk-based Assessment
- 1.18 Energy Statement
- 1.19 Socio-Economic Sustainability Statement
- 1.20 Sustainability Assessment of Mickleton
- 1.21 Statement of Community Involvement

CD2 Documents sent to CDC Following Submission

- 2.01 Enlarged Illustrative Masterplan (Dwg no: 5932-L-03)
- 2.02 Secretary of State Screening Direction 21 July 2014
- 2.03 Amended Illustrative Masterplan (Dwg no: 5932-L-03 Rev A)
- 2.04 Transport Technical Note 1 (9 July 2014)
- 2.05 Transport Technical Note 2 (12 August 2014)
- 2.06 Transport Technical Note 2a (12 August 2014)
- 2.07 Transport Technical Note 3 (15 August 2014)
- 2.08 Site Access Arrangement Refuse Vehicle Track Pilot (Dwg no: C13684-003 A)
- 2.09 Mickleton Traffic Flows
- 2.10 North Junctions Report
- 2.11 South Junction Report
- 2.12 Chapel Lane/High Street existing Arrangements (Dwg no: C13684-004)
- 2.13 Sapcote Appeal Decision
- 2.14 Great Crested Newt Report (August 2014)
- 2.15 Bat Survey Report (August 2014)
- 2.16 Fairford Appeal Decision
- 2.17 Soil survey results map
- 2.18 Geophysical Survey Results Note and maps

CD3 Correspondence with Local Planning Authority

- 3.01 29-04-14 Screening Opinion Letter from Cotswold DC
- 3.02 22-05-14 Email to Alison Curtis regarding Transport Assessment
- 3.03 03-06-14 Pre-Application Advice Note

- 3.04 10-06-14 Email from Alison Curtis commenting on Transport Assessment
- 3.05 23-06-14 Email to Claire Baker providing enlarged illustrative
- 3.06 24-06-14 Email from Claire Baker acknowledging that master-plan is illustrative only
- 3.07 09-07-14 Email forwarding County Archaeologist comments
- 3.08 09-07-14 Email and attachment addressing GCC Highway Team comments on the TA
- 3.09 10-07-14 Email clarifying Conservation & Design Response
- 3.10 11-07-14 Email setting out GCC Education contributions
- 3.11 21-07-14 Email response to County Archaeologist comments
- 3.12 21-07-14 Email chasing response from GCC Highways Team
- 3.13 29-07-14 Email from Claire Baker containing signed Planning Performance Agreement
- 3.14 04-08-14 Further email chasing response from GCC Highways Team
- 3.15 05-08-14 Holding response from GCC Highways Team
- 3.16 08-08-14 Response from GCC Highways Team
- 3.17 11-08-14 Email confirming pre-determination meeting with Case Officer
- 3.18 12-08-14 Email to GCC Highways containing Technical Note 2
- 3.19 12-08-14 Email to GCC Highways containing Site Access drawing
- 3.20 12-08-14 Email containing updated illustrative master-plan
- 3.21 14-08-14 Email from GCC Highways containing Trip Generation data
- 3.22 14-08-14 Email to GCC Highways containing revised Technical Note

CD3 Correspondence with Local Planning Authority Continued

- 3.23 15-08-14 Email to GCC Highways containing Technical Note 3
- 3.24 15-08-14 Email to Claire Baker summarising pre-determination
- 3.25 18-08-14 Email from GCC Highways requesting additional information
- 3.26 21-08-14 Response to GCC Highways supplying sequestration information
- 3.27 21-08-14 Email to Claire Baker setting out response to Thames Water
- 3.28 21-08-14 Email forwarding Parish Council contribution request
- 3.29 26-08-14 Email confirming no Highways objection
- 3.30 26-08-14 Email to Claire Baker containing GCN report
- 3.31 27-08-14 Email regarding Education Contributions and CIL Compliance
- 3.32 27-08-14 Email from Claire Baker confirming accuracy of meeting summary
- 3.33 29-08-14 Email to Claire Baker containing additional bat survey report
- 3.34 03-09-14 Email regarding CIL compliance of Education Contribution
- 3.35 03-09-14 Email forwarding Parish Council view on proposed sports
- 3.36 03-09-14 Email outlining CIL compliance of requested NHS contributions
- 3.37 08-09-14 Email from Claire Baker confirming intention to seek delegated refusal on archaeology and s106 agreement grounds
- 3.38 09-09-14 Email to Claire Baker acknowledging intention to seek delegated refusal
- 3.39 10-09-14 Email from Claire Baker confirming members want to debate the application at Planning Committee
- 3.40 10-09-14 Email querying whether application will be considered at Committee
- 3.41 10-09-14 Email confirming application will have to be considered by

- the Planning Committee
- 3.42 10-09-14 Email querying whether application could still be refused under delegated powers
- 3.43 11-09-14 Email outlining rationale for taking application to Committee
- 3.44 11-09-14 Email requesting Case Officer's Committee Report
- 3.45 11-09-14 Email outlining committee report procedure
- 3.46 16-09-14 Email forwarding Biodiversity Officer response
- 3.47 16-09-14 Email exchange regarding soil quality
- 3.48 16-09-14 Email addressing Biodiversity Officer concerns
- 3.49 17-09-14 Email from Case Officer confirming she will forward comments to Biodiversity Officer
- 3.5 23-09-14 Email exchange chasing Committee Report
- 3.51 30-09-14 Further email to Case Officer chasing Committee Report plus info on Fairford appeal decision
- 3.52 30-09-14 Response from Case Officer confirming CDC aware of Fairford appeal decision
- 3.53 30-09-14 Email from Case Officer forwarding response from Mickleton Parish Council
- 3.54 01-10-14 Email to Case Officer clarifying various points
- 3.55 02-10-14 Email from Case Officer confirming further details passed to County Archaeologist and seeking clarifying on various points
- 3.56 02-10-14 Email from Case Officer forwarding County Archaeologist's response
- 3.57 02-10-14 Response to Case Officer

CD4 Officer's Committee Report

- 4.1 Officer's Committee Report

CD5 Decision Notice

- 5.1 Decision Notice

CD6 Consultation Responses

- 6.01 24th July 2014 - Affordable Housing - CDC Housing Enabling Officer
- 6.02 24th June 2014 - GCC Archaeologist
- 6.03 4th July 2014 - Chipping Campden Town Council
- 6.04 3rd July 2014 - CDC Environmental Protection Officer
- 6.05 3rd September 2014 - Development Services - Biodiversity FINAL
- 6.06 8th July 2014 - Development Services - Biodiversity
- 6.07 11th July 2014 - GCC Asset Management & Property Services
- 6.08 10 July 2014 - Environment Agency
- 6.09 27th June 2014 - Development Services - Conservation
- 6.10 1st July 2014 - Development Management - Highways
- 6.11 26th August 2014 - Development Management - Highways FINAL
- 6.12 10th July 2014 - Development Services - Landscape
- 6.13 15th July 2014 - NHS Property Services
- 6.14 9th July 2014 - Mickleton Parish Council
- 6.15 2nd July 2014 - Severn Trent Water
- 6.16 7th July 2014 - Thames Water
- 6.17 31st July Development Services - Tree Team

CD7 Planning documents

- 7.1 Extracts from emerging Local Plan Feb 2015
- 7.2 New housing land supply paper 2015 and Residential Land Monitoring

	Stats April 2015
7.3	New Housing Land Supply Paper 2015
7.4	Housing and growth
7.5	Affordable housing SPD
7.6	Local Plan Reg 18 Consultation: Development Strategy & Site Allocations Jan 2015
7.7	Local Plan 2001-2011(ELECTRONIC ONLY)
7.8	Regional Spatial Strategy (ELECTRONIC ONLY)
7.9	Structure Plan 1991-2011 (ELECTRONIC ONLY)
7.10	Structure Plan 2001-2016 (ELECTRONIC ONLY)
7.11	Local Plan Consultation Paper Preferred Development Strategy 2013 (ELECTRONIC ONLY)
7.12	NPPG (ELECTRONIC ONLY)
7.13	NPPF (ELECTRONIC ONLY)
7.14	NPPF Technical Guidance (ELECTRONIC ONLY)
7.15	Planning and Compulsory Purchase Act (ELECTRONIC ONLY)
7.16	CIL (ELECTRONIC ONLY)
7.17	Regional Planning Guidance for the South West (RPG 10) (ELECTRONIC ONLY)
7.18	The Regional Strategy for the South West (Revocation) Order (ELECTRONIC ONLY)
7.19	Saved Policies and Schedule (ELECTRONIC ONLY)

CD8 Additional Documents

Landscape

8.01	Cotswold DC land sensitivity report - EXTRACTS
8.02	Cotswolds AONB LCA - EXTRACTS
8.03	Gloucestershire LCA 2006 - EXTRACTS
8.04	Landscape Character Assessments outside AONB - CHAPTERS 1 AND 4 ONLY
8.05	NCA 106 Severn and Avon Vales MW171214
8.06	NCA107 Cotswolds 160315MW

Housing & Sustainability

8.07	Housing Evidence Paper December 2014
8.08	MacDonald and Whitehead
8.09	Gloucestershire SHMA 2014
8.10	Inspector's Interim Conclusions
8.11	PS A017b Inspectors Interim Views
8.12	Mickleton Mosaic March 2015 Understanding Demographics Describing Mickleton In Relation To Cotswold
8.13	Mickleton PDP March 2015 Property Development Pack Describing Mickleton In Relation To Cotswold
8.14	Department for Transport: National Travel Survey: England 2013
8.15	Office for National Statistics - Characteristics of Home Workers, 2014
8.16	ONS: The Headlines: Household Expenditure at a Glance, published 2012
8.17	ONS: The Headlines: Household Expenditure at a Glance, published 2013
8.18	DEFRA: Policy brief - how increased connectivity is boosting economic prospects of rural areas, December 2014
8.19	ONS: Record proportion of people in employment are home workers
8.20	Cotswold District Local Plan: Evidence Base Development Strategy Evidence Paper April 2013

- 8.21 Cotswold District Council: Residential Land Monitoring Statistics April 2014
- 8.22 Cotswold District Council: Role and Function of Settlements Study Local Plan: Evidence Base July 2012
- 8.23 TUC: Home-working on the increase despite the recession, May 2013
- 8.24 UCL: Research into Rural Housing Affordability, Executive summary

CD9 Appeal decisions

- 9.01 Land at Gaydon Road, Bishop's Itchington, Southam, Warwickshire Ref: APP/J3720/A/13/2202961: 29 January 2014
- 9.02 Land opposite Rose Cottages, Holmes Chapel Road, Brereton Heath, Cheshire Ref: APP/RO660/A/13/2192192: 12 February 2014
- 9.03 Land Off Banady Lane, Stoke Orchard, near Tewkesbury, Gloucestershire Ref: APP/G1630/A/14/2223858: 22 January 2015
- 9.04 Land off Bath Road, Leonard Stanley Ref: APP/C1625/A/13/2207324: 21 July 2014
- 9.05 Land off Nantwich Road, Tarporley, Cheshire Ref: APP/A0665/A/11/2167430 29 August 2013
- 9.06 Land off Walden Road, Thaxted Ref: APP/C1570/A/14/2222958 : 1 June 2015
- 9.07 Highfield Farm, Tetbury, Glos APP/F1610/A/11/2165778; 13 February 2013
- 9.08 Tetbury JR [2013] EWHC 3719 (Admin)
- 9.09 Land to the South of Berrells Road and to the west of Bath Road, Tetbury, Glos APP/F1610/A/12/2173305; 13 February 2013
- 9.10. Bishop's Cleeve APP/G1630/A/11/2146206, APP/G1630/A/11/2148635 16 July 2012
- 9.11 Land off Station Road, Bourton-on-the-Water, Gloucestershire Ref: APP/F1610/A/13/2196383 15 January 2014
- 9.12 Land at Todenham Road, Moreton in Marsh, Gloucestershire APP/F1610/A/10/2130320; 12 April 2011
- 9.13 St Albans v SoS Hunston
- 9.14 SoS Hunston v St Albans
- 9.15 Paddock adjacent Glyde House, Stratford Road, Mickleton, Chipping Campden APP/F1610/A/12/2182300, 21 December 2012
- 9.16 Land adjacent Badgers Field, George Lane, Chipping Campden, Glos APP/F1610/A/12/2173963 25 September 2012
- 9.17 Land at Top Farm, Kemble, Cirencester, Gloucestershire Ref: APP/F1610/A/12/2173097: 9 January 2013
- 9.18 Wells Masonry Group Ltd, Ilsom Farm, Ilsom, Tetbury Ref: APP/F1610/A/13/2193264 3 July 2013
- 9.19 4 - 6 Black Jack Street, Cirencester, Glos APP/F1610/A/12/2189488 & APP/F1610/E/13/2189900 12 August 2013
- 9.20. Land adjacent to Badgers Field, George Lane, Chipping Camden, Glos Ref: APP/F1610/A/13/2202439 12 November 2013
- 9.21 Land west of Siddington Road, Siddington, Cirencester Ref: APP/F1610/A/11/2161332 13 July 2012
- 9.22 APP/Y2810/A/14/2228921, New Street, Weedon, Northamptonshire, determined 12 June 2015, §86
- 9.23 APP/Y2810/A/14/2225722, Salisbury Landscapes Ltd, Boughton Road, Moulton, Northampton, determined 18 June 2015, §80
- 9.24 APP/D0840/A/13/2209757, Land north of Upper Chapel, Launceston PL15 7DW, determined 11 April 2014, §51

- 9.25 APP/F1610/A/13/2203411 Land at Oddington Road, Stow-on-the-Wold
9.26 APP/P1133/A/12/2188938 Land to the South of Shutterton Lane,
Dawlish, Devon. Allowed 10 September 2013
9.27 APP/H1840/A/13/2199085 and APP/H1840/A/13/2199426 Land at Pulley
Lane, Newland Road and Primsland Way, Droitwich Spa
9.28 APP/F1610/A/14/2213318 Land south of Cirencester Road Fairford GL7
4BS
9.29 [2015] EWHC 488 (Admin) Stroud DC -v- SoS and Gladman

CD 10 Second Planning Application

- 10.1 Framework Plan Rev K
10.2 Planning Committee Report
10.3 Decision notice
10.4 Consultation responses - ELECTRONIC ONLY
10.5 Representations - ELECTRONIC ONLY
10.6 Further archaeology report revised scheme
10.7 Agricultural land report revised scheme
10.8 DAS Addendum Rev C
10.9 Email from GCC to LPA confirming land for school expansion not required

CD 11 Miscellaneous Documents

- 11.1 Committee report Cala site
11.2 Committee report Newland site

PLANS

- | | | | | |
|-------|---|---|---|--------------|
| Plans | A | 1 | Revised 'development framework plan | 5932-L-01/K |
| | | 2 | Site access arrangements | C13684-002/B |
| Plan | B | 1 | 'Development framework layout plan | 5932-L-03/B |
| | | 2 | Site access arrangements | C13684-002 |
| Plan | C | | Agricultural land quality; south west region, Natural England | |

Schedule of Conditions

Details

- 1) Details of reserved matters set out below ('The Reserved Matters') shall be submitted to the Local Planning Authority for approval within three years from the date of this permission:
 - i. layout,
 - ii. scale,
 - iii. appearance, and
 - iv. landscaping.

The development shall be carried out in accordance with the approved 'Reserved Matters'. Approval of all 'Reserved Matters' shall be obtained from the Local Planning Authority in writing before any development commences.
- 2) The development shall begin no later than 2 years from the date of approval of the last of the reserved matters to be approved
- 3) The development hereby permitted shall be carried out along the lines shown on the 'development framework plan' 5932-L-01/K and shall be limited to no more than 90 dwellings.

Affordable housing

- 4) Prior to commencement of development, a scheme for the provision of affordable housing as part of the development shall be submitted to and approved in writing by the Local Planning Authority. The affordable housing shall be provided in accordance with the approved scheme and shall meet the definition of affordable housing in the National Planning Policy Framework, or any future guidance that replaces it. The scheme shall include:
 - i. the numbers, type, tenure and location on the site of the affordable housing provision to be made, which shall consist of not less than 50% of the total number of dwellings permitted;
 - ii. the timing of the construction of the affordable housing and its phasing in relation to the occupancy of the market housing;
 - iii. the arrangements for the transfer of the affordable housing to an affordable housing provider, or alternative arrangements for the future management of the affordable housing;
 - iv. arrangements to ensure that the affordable housing is affordable not only for the first occupiers but also for subsequent occupiers; and
 - v. the occupancy criteria to be used for determining the identity of occupiers of the affordable housing, and the means by which such occupancy criteria will be enforced.

Drainage

- 5) No development shall take place until a scheme for the provision and future management and maintenance of the surface water drainage from the site, incorporating 'sustainable drainage principles', together with a timetable for its implementation has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented in full before the development is first occupied and shall be retained at all times thereafter.
- 6) The development hereby permitted shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) produced by Hydrock Ref R/C13684 dated 22 May 2014 and the following mitigation measures detailed with the FRA:

Limiting the surface water run-off from the development to the equivalent existing green-field run-off rates so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site,

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing and phasing arrangements embodied within the scheme, or within any other period as may be subsequently agreed in writing by the Local Planning Authority.

Ecology

- 7) No development works shall take place on site until a Badger Mitigation Strategy and a 10 year Landscape and Ecological Management Plan (to include pond restoration) and based on the recommendations in the Ecological Appraisal (December 2014), the Bat Survey report (January 2015) and the Great Crested Newt Survey report (August 2014) by fpcr (and illustrated on drawing no. 5932-L-03 rev B) has been submitted to and approved in writing by the Local Planning Authority. All the works must be carried out in accordance with the details in the approved plans and strategies, and thereafter permanently maintained.

Tree protection

- 8) Prior to the commencement of development, a tree protection plan and arboricultural method statement that accords with BS5837:2012 shall be submitted for approval to the Local Planning Authority. Once the tree protection plan and method statement have been agreed in writing by the Local Planning Authority, all the details shall be implemented in full and in accordance with any timescales laid out in the tree protection plan and method statement.

Roads and surfaces

- 9) No dwelling, hereby approved, shall be occupied until the access arrangements shown on the Proposed Access Drawing C13684-002 Rev B have been completed and open to the public.

Construction method statement

- 10) Construction works pursuant to this permission shall not take place other than between the hours 08.00hrs and 18.00hrs Monday to Fridays and between 08.00hrs and 13.00hrs on Saturdays. No works shall take place on Sundays or on Bank or Public Holidays.
- 11) No development shall commence until a Construction, Transport & Management Plan, has been submitted to, and approved in writing by, the Local Planning Authority. The Plan shall include details of:
 - i. Parking for vehicles of site personnel, operatives and visitors;
 - ii. Loading and unloading of plant and materials;
 - iii. Storage of plant and materials used in constructing the development;
 - iv. Provision of boundary hoarding behind any visibility zones;
 - v. Wheel washing facilities
 - vi. Measures to control the emission of dust and dirt during construction;
 - vii. On-site turning facilities for construction vehicles; and
 - viii. A scheme for recycling or disposing of waste resulting from the construction works.

Contamination

- 12) No development shall take place until a site investigation of the nature and extent of contamination has been carried out in accordance with a methodology which has previously been submitted to and approved in writing by the Local Planning Authority. The results of the site investigation shall be made available to the Local Planning Authority before any development begins.
- 13) If any significant contamination is found during the site investigation, a report specifying the measures to be taken to remediate the site to render it suitable for the development hereby permitted shall be submitted to and approved in writing by the Local Planning Authority before any development begins. The Remediation Scheme, as agreed in writing by the Local Planning Authority, shall be fully implemented in accordance with the approved timetable of works and before the development hereby permitted is first occupied. Any variation to the scheme shall be agreed in writing with the Local Planning Authority in advance or works being undertaken. On completion of the works the developer shall submit to the Local Planning Authority written confirmation that all works were completed in accordance with the agreed details.
- 14) If, during the course of development, any contamination is found which has not been identified in the site investigation, additional measures for the remediation of this contamination shall be submitted to and approved in writing by the Local Planning Authority. The remediation of the site shall incorporate the approved additional measures.



Report to Stroud District Council

by Stephen J Pratt BA (Hons) MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

2nd November 2015

PLANNING AND COMPULSORY PURCHASE ACT 2004 (as amended)

SECTION 20

REPORT ON THE EXAMINATION OF THE STROUD DISTRICT LOCAL PLAN

Document submitted for examination on 18 December 2013

Examination hearings held on 1-3 April 2014, 12-14 May 2015
& 28 May – 12 June 2015

File Ref: PINS/C1625/429/5

ABBREVIATIONS USED IN THIS REPORT

AONB	Area of Outstanding Natural Beauty
CBC	Cheltenham Borough Council
CIL	Community Infrastructure Levy
C&RT	Canal & River Trust
DCLG	Department for Communities & Local Government
DTC	Duty to Co-operate
dw/yr	dwellings per year
EA	Environment Agency
EH/HE	English Heritage/Historic England
ELS	Employment Land Study
GCC	Gloucester City Council
G&T	Gypsy and Traveller
GTAA	Gypsy & Travellers Accommodation Assessment
GVA	Gross Added Value
ha	hectares
HA	Highway Authority
HE	Highways England (formerly Highways Agency)
HCA	Homes & Communities Agency
HFR	Household Formation Rates
HRA	Habitat Regulations Assessment
IDP	Infrastructure Delivery Plan
JCS	Gloucester, Cheltenham & Tewkesbury Joint Core Strategy
LDS	Local Development Scheme
LEP	Local Enterprise Partnership
LTP	Local Transport Plan
MM	Main Modification
NE	Natural England
NPPF	National Planning Policy Framework
¶/para	paragraph
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SDC	Stroud District Council
SDLP	Stroud District Local Plan
SEA	Strategic Environmental Assessment
SEP	Strategic Economic Plan
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SIDP	Strategic Infrastructure Delivery Plan
SOC	Statement of Co-operation
SOCG	Statement of Common Ground
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
SWRSS	South-West Regional Spatial Strategy
TBC	Tewkesbury Borough Council
UPC	Unattributable Population Change
WoS	West of Stonehouse

Non-Technical Summary

This report concludes that the Stroud District Local Plan provides an appropriate basis for the planning of the district until 2031 providing a number of modifications are made to the plan. Stroud District Council has specifically requested me to recommend any modifications necessary to enable the plan to be adopted. All of the modifications to address this were proposed by the Council, and I have recommended their inclusion after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- Amend the Strategic Objectives to address sustainable transport and the protection of water resources;
- Increase the overall housing requirement figure from 9,500 to 11,400 dwellings (2006-2031), with an additional provision of 950 care home spaces (2013-2031), and increase the employment land requirement from 37ha to 58ha (2006-2031), with an amended figure of between 6,800-12,500 net new jobs, and consequential amendments and updating of housing supply figures;
- Amend the commitment in Policy CP2 to an early review of the Plan commencing within five years of adoption or by December 2019, whichever is the sooner, and recognise the possibility of considering the need to assist other local planning authorities in the housing market area in meeting their future unmet objectively assessed development and infrastructure needs;
- Increase the capacity of the proposed strategic sites at Stroud Valleys from 300 to 450 dwellings, including Ham Mill (100), Brimscombe Port (150) and Wimberley Mills (100), with consequential amendments to Policy SA1 and the accompanying text and diagrams, including references to flood mitigation, infrastructure, highways and sustainable transport;
- Add a proposed new sustainable urban extension at West of Stonehouse (1,350 dwellings and 10ha of employment land), along with associated infrastructure, facilities and services, as set out in the Guiding Principles and detailed policy requirements, with consequential amendments to the Policies Map and diagrams;
- Add references to flood risk, infrastructure, highways and sustainable transport in the development strategy for Cam & Dursley;
- Increase the capacity and site area of the proposed Hunts Grove strategic site from 500 to 750 dwellings, with consequential amendments to Policy SA4, the accompanying text, Policies Map and diagrams, including references to flood mitigation, infrastructure, highways and sustainable transport;
- Add references to flood mitigation, impact on the Severn Estuary SAC/SPA, infrastructure, highways and sustainable transport in the strategy for Sharpness, including references to the Gloucestershire Science & Technology Park at the former Berkeley Power station site, with an additional policy and consequential amendments to the accompanying text, Policies Map and diagrams;
- Amend the affordable housing policy, to reflect the revised assessment of need for affordable housing and tenure split;
- Confirm that provision of self-build housing will be subject to appropriate demand being demonstrated;
- Confirm that the provision of employment space at sites allocated for mixed-use redevelopment will be subject to viability and site-specific circumstances;
- Amend policies on sustainable construction, design and low/zero-carbon energy to reflect the latest Government policy;
- Amend policies on ecological protection to reflect national policy on European Sites, including Severn Estuary and Rodborough Common, and Protected Species;
- Amend the detailed wording of policies to reflect discussions and agreements with prescribed bodies, including Environment Agency, Highways England, Highways Authority, Historic England and Natural England, relating to flood risk and mitigation, infrastructure delivery, highways and sustainable transport;
- Update and amend housing supply and delivery information, monitoring framework and glossary.

Introduction

1. This report contains my assessment of the *Stroud District Local Plan* (SDLP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan complies with the legal requirements, including the Duty to Co-operate, recognising that there is no scope to remedy any failure of the latter requirement. It then considers whether the Plan is sound in terms of the National Planning Policy Framework, which confirms that to be sound, a local plan should be positively prepared, justified, effective and consistent with national policy (NPPF; ¶ 182).
2. The starting point for the Examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The basis for the examination is the *Stroud District Local Plan Submission Draft* (December 2013) [CD/A1]. I have also had regard to the accompanying Schedule of Minor Modifications [CD/A5; Appx.5].
3. The examination was held in two stages; Stage 1 (April 2014) dealt with the legal requirements, including the Duty to Co-operate, and the objective assessment of housing need and employment land requirements. In June 2014, after these hearings had finished, my Interim Conclusions on Stage 1 of the Examination were issued [PSD/21]. These confirmed that the legal requirements of the Duty to Co-operate had been met, but concluded that Stroud District Council (SDC) had not properly undertaken an objective assessment of housing needs for the district, having regard to the close relationship between Stroud and Gloucester City and the wider housing market area. There were also some deficiencies in the justification for the economic and employment strategy of the Plan, and its relationship with the proposed level of housing provision and the wider economic strategy for Gloucestershire, and the guidance in the NPPF and Planning Practice Guidance (PPG). In addition, there were concerns about the lack of evidence to justify and support the strategy and the proposed allocations, particularly in terms of highways and transport assessments and the impact of proposed developments on the strategic road network. As a result, the examination was suspended in order for SDC to undertake further work on these matters.
4. In December 2014, after undertaking a revised assessment of housing and employment land requirements, SDC resolved to increase the overall level of housing provision and to allocate a further strategic housing site at West of Stonehouse [PS/E12]. Formal consultation was undertaken on these Post-Submission Proposed Changes in February-March 2015 [REX/B15a]. In February 2015, my Initial Views on the work undertaken during the suspension of the examination were issued [REX/A08], and in April 2015, the examination was resumed to review and assess this additional work. In May-June 2015, Stage 2 of the examination hearings dealt with the remaining policies and proposals in the Plan, including strategic site allocations and the Post-Submission Proposed Changes. Consultation on Further Post-Submission Proposed Changes [PS3/01] was undertaken in August-September 2015.
5. This report deals with the Main Modifications needed to make the SDLP sound, as identified in bold in the report **[MM]**. In accordance with section 20(7C) of the 2004 Act, SDC has requested me to recommend any modifications needed to rectify matters that make the plan unsound or not legally compliant, and thus incapable of being adopted. These Main Modifications are set out in the accompanying Appendix. SDC also proposes to make other minor changes (“Additional Modifications”) to the Plan, which do not affect its overall soundness and do not need any positive recommendation from me.
6. The Main Modifications that are needed to ensure the SDLP is sound all relate to matters that were discussed at the examination hearings. All the Main Modifications were subject to sustainability appraisal and public consultation in two stages over 6-week periods, and I have taken account of the representations in coming to my conclusions.

7. My approach to the Examination has been to work with SDC and other participants in a positive, pragmatic and supportive manner. In so doing, I have considered all the points made in the representations, statements and at the hearing sessions. However, the purpose of this report is to consider the legal compliance and soundness of the Plan, giving reasons for the recommended modifications, rather than responding to every point made in the representations and discussions. References to documentary sources are provided thus [].

Assessment of Legal Compliance

8. At the hearing sessions of the examination, some participants expressed concern about the Sustainability Appraisals (SA), particularly in terms of the nature and extent of public consultation undertaken and the consideration of alternative strategies and sites. SDC has responded to these concerns and I am generally satisfied with these responses [REX/D09a; PS2/D14b; PS3/09].
9. Section 19(5) of the Act requires local authorities to carry out a SA of their local plan, reflecting the SEA Directive/Regulations; further guidance is given in the NPPF (¶ 150-151; 165) and the PPG [ID-11], which has been confirmed and clarified by the Courts¹. In essence, local authorities have to undertake SA at each stage of the local plan preparation process, along with public consultation; they also have to consider reasonable alternatives, which should be subjected to the same level of analysis as the preferred option, but they have discretion in identifying what are reasonable alternatives. Options may be rejected during plan preparation, and do not have to be reconsidered at every stage, provided that reasons for rejecting earlier options and selecting preferred options are given; an addendum to the SA is also capable of correcting defects in earlier SA work.
10. SDC published several SA reports during the course of preparing the SDLP [CD/A3-A4a; CD/F4-F6; CD/F16-F18; PS/E18; REX/B15b; PS3/03-04]. Opportunities were available to comment on the SA work at all relevant stages, including at publication stage; relevant SA documents were published at the same time as the consultation documents of the SDLP. SDC notified all the prescribed and specific consultation bodies, made the SA documents available for inspection and made it clear that these documents were available for public consultation; this includes the SA Addendum published with the Post-Submission Proposed Changes in February 2015 [PS/E18]. SA work is an iterative process, and SDC confirms that the SA Addendum did not cover the methodology, since this had been set out in earlier SA reports and had been available for consultation at an earlier stage. Having considered all the evidence, I find that SDC has met the requirements of the Local Planning and SEA Regulations as regards consultation on the SA and its Addendum, in line with national advice in the NPPF & PPG [ID-11].
11. As for the factual content of the SA work, there is some dispute about whether the earlier assessments of the Whaddon site option correctly reflected the position in terms of accessibility to community facilities and flood risk. SDC explains that the earlier SA work was a broad-brush assessment, based on the information available at the time. At my request, SDC’s consultants undertook a further comparative assessment of site options at Hunts Grove and Whaddon, on the southern fringe of Gloucester, and this was included in the SA for the Further Post-Submission Proposed Changes [PS3/03]; this rectifies any deficiencies in the earlier assessment. When read as a whole, the SA work has assessed a broad range of reasonable and realistic options based on various levels of housing provision, including the figure endorsed by SDC at the Further Post-Submission Proposed Changes stage and the eventual recommended figure. Both the SA work and the Habitats Regulations Assessments have also fully addressed the impact of proposed developments on the Severn Estuary and Rodborough Common SAC/SPA. Since the SA identified likely significant effects on the baseline, it took account of the co-existence of new development with existing communities.

¹ including *Ashdown Forest Economic Development v Wealden DC* (2014), *Satnam Millennium v Warrington BC* (2015) and *Calverton PC v Nottingham CC* (2015)

12. Much of the concern about considering alternative strategies and sites focuses on potential development options within Stroud district on the southern fringe of Gloucester, including at Hardwicke and Whaddon. At the hearings, SDC outlined its approach to considering alternative strategies and site options, and responded to particular concerns following a specific High Court judgement [PS2/D14b]. SDC confirms that reasonable alternatives were identified, described and evaluated throughout the SA/SEA process, with the findings published, including the reasons for rejecting and selecting various options. The consideration of alternative strategies goes back to the Options stage, where concentrated and dispersed strategies based on the former SWRSS review were considered, including options to the south of Gloucester [CD/E2; CD/F15-F16]. At the Preferred Strategy and Submission stages, alternative site options were considered as part of developing a range of reasonable alternatives to inform the final Plan, including scenarios based on various housing numbers, with reasons for selecting the preferred approach [CD/F15-F18]. A further range of alternatives was considered to inform the Post-Submission Proposed Changes, including alternative growth scenarios and sites, focused on those which fell within the strategy of the Plan [PS/E18].
13. The SEA/SA regulations only require the identification and assessment of “reasonable” alternatives; i.e. those that reflect the objectives of the plan and are achievable, rather than every conceivable or possible option. Furthermore, since the SA process is an iterative approach, during which reasonable alternatives are refined [PPG; ID-11], once potential alternatives have been rejected, with the reasons for doing so, there is no requirement to keep going back to consider such alternatives throughout the plan-making process. SDC has not avoided its obligation to evaluate reasonable alternatives by unduly restricting the range of options assessed or rejecting earlier options without good reason. Although some of the SA reports could have been more explicit about the alternatives considered, when read as a whole, the requirements of the SEA/SA Regulations have been met, in line with national advice [PPG: ID-11].
14. As regards other aspects of legal compliance, there have been comments about the nature, adequacy and conduct of public consultation, but as far as I can see, all relevant bodies have been consulted and involved during the plan preparation process, and it fully complied with the procedures outlined in the Statement of Community Involvement and the requirements of the Local Planning Regulations.
15. My assessment of these and other aspects of legal compliance of the SDLP is summarised below, and confirms that it meets all the relevant legal requirements.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The SDLP is identified within the approved LDS (2009) [PS/B16], and its role and content comply with the LDS. It is also consistent with the current timetable of plan preparation [CD/F1].
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in November 2007 [CD/A8a], with an addendum in January 2009 [CD/A8b]. SDC has confirmed that all relevant evidence and documents were publicly available during the consultation period and at submission stage, and later documents were available in the examination library and included on the examination web-site. The plan-making and consultation processes met the minimum requirements of the Local Development Regulations and SDC’s adopted SCI, including consultation on Main Modifications.
Sustainability Appraisal (SA)	Adequate SA has been carried out at all stages during the preparation of the SDLP, including at the Pre-Submission and Main Modifications stages [CD/A3-A4a; CD/F4-F6; CD/F16-F18; PS/E18; REX/B15b; PS3/03-04]. As outlined above, SDC has identified and assessed reasonable alternative strategies,

	growth and site options throughout the preparation of the plan, both for the overall level of housing and its spatial distribution, and undertaken consultation at each stage.
Appropriate Assessment	Habitats Regulations Assessment has been undertaken and updated [CD/A4b; CD/F13; PS/E20; PS3/02] to the satisfaction of Natural England [PS/D15a; REX/B04].
National Policy	The SDLP is consistent with national policy, except where indicated and modifications are recommended.
2004 Act (as amended) and 2012 Regulations	The SDLP complies with the Act and the Local Planning Regulations.

Assessment of the Duty to Co-operate

16. Section 20(5)(c) of the 2004 Act requires me to consider whether the Council has complied with any duty imposed on them by s33A of the Act in relation to the preparation of the Plan. This requires SDC to co-operate in maximising the effectiveness of plan-making, and to engage constructively, actively and on an on-going basis with neighbouring planning authorities and prescribed bodies when preparing development plan documents with regard to a strategic matter. This is defined as sustainable development or use of land which has or would have a significant impact on at least two planning areas, including sustainable development or use of land for strategic infrastructure. This Duty (DTC) is closely related to the requirements in the NPPF (¶ 178-181), and the soundness tests which require plans to be positively prepared and effective (NPPF; ¶ 182). My Initial Conclusions on Stage 1 of the Examination [PSD/21] confirmed that SDC had met the legal requirements of the DTC, and this section of my report summarises and updates the main considerations and conclusions on this legal requirement.
17. SDC has submitted evidence outlining how it has engaged constructively, actively and on an ongoing basis with neighbouring authorities and prescribed bodies during the preparation of the Plan [CD/A6; PS/B11; PS/B23; REX/B09]. This has involved co-operating and engaging with neighbouring authorities, established groups and partnerships, identifying and discussing strategic and cross-boundary matters, including housing provision, and progressing specific projects and joint evidence; the outputs of co-operation are reflected in the submitted Plan and Statement of Co-operation (SOC) [REX/B09].
18. Established systems of co-operation exist between local planning authorities in Gloucestershire, for both officers and elected members, which help to co-ordinate strategic planning across the county. These culminated in a SOC between SDC, Gloucester City Council (GCC), Cheltenham Borough Council (CBC) and Tewkesbury Borough Council (TBC) (the “JCS” authorities, who are preparing their own Joint Core Strategy (JCS) for their area) [REX/B09]. There has been specific engagement and co-operation with the JCS authorities, as part of preparing the SDLP and the JCS, and separately with GCC. Joint working on evidence included Strategic Housing Market Assessments (SHMA), Gypsy & Traveller Accommodation Assessment (GTAA), Strategic Flood Risk Assessment (SFRA) and Strategic Infrastructure Delivery Plans (SIDP). Regular meetings have also been held with the GFirst Local Enterprise Partnership (LEP) and other relevant bodies and agencies, including Highways England (formerly the Highways Agency), the Highway Authority, Environment Agency, Natural England and Historic England (formerly English Heritage). SOCGs have been drawn up with all these bodies [REX/B02-B05].
19. SDC has identified the main strategic and cross-boundary priorities, including housing, employment, environment and infrastructure [CD/A6]. There has been some co-operation and discussion about the overall level of housing required for each of the authorities, and there is general agreement with the JCS and other neighbouring authorities about the overall level of housing proposed for Stroud.

At the time of submitting the original plan, there was no commonly agreed approach to identifying the objective assessment of housing needs for the Gloucestershire strategic housing market as a whole, but following suspension of the examination, both SDC and the other Gloucestershire authorities have used the same consultants to undertake an objective assessment of housing needs for each area in a consistent manner over the wider strategic housing market area.

20. The results of co-operation have influenced the content and strategy of the SDLP. Development in Stroud district on the southern fringe of Gloucester has been limited to consolidating existing development at Hunts Grove and East Quedgeley (although GCC still objects to further expansion at Hunts Grove). A Local Plan review mechanism is now included in the SDLP to enable any future unmet needs to be met, with the detailed wording now agreed with GCC, CBC & TBC. A joint approach to the Aston Down employment site and complementary policy wording on canal restoration has been agreed with Cotswold District; and a joint county-wide approach to Allowable Solutions has been agreed.
21. The SOC between SDC, GCC, CBC & TBC [REX/B09] confirms that, currently, there is no specific requirement for SDC to meet the unmet housing or other needs of any other area and SDC does not require any other area to meet any of its needs. However, in August 2013, the JCS authorities alerted other authorities to the possibility that they may need to formally request assistance under the DTC if more housing is required to meet the needs of the JCS area, but at present, the scale of any possible future unmet needs has not been identified. However, SDC has included a mechanism to review the SDLP should any unmet needs arise in the future. In the current circumstances, this is about as far as SDC can go in the absence of any specific identified potential unmet requirement; it is a practical, pragmatic and reasonable approach.
22. During plan preparation and during the early stages of this examination, both CBC & TBC considered that SDC had not fully met the requirements of the DTC, particularly during the earlier stages of preparing the Plan when key elements of policy and the spatial distribution of development over the wider JCS/Stroud area, including land south of Gloucester, could have been considered. The historical position is complex [PS/D16ab], but the former draft SWRSS (Proposed Changes; 2008) included 3,500 dwellings within Stroud district to meet some of the housing needs of Gloucester and Cheltenham, to be identified through areas of search; however, the former SWRSS review process was never completed, following its revocation. Early drafts of the SDLP used the former draft RSS overall housing provision figure and assumed that housing would be delivered in these areas of search, but did not specifically carry forward any provision for Gloucester or Cheltenham; options for the emerging SDLP did not consider any provision to meet some of the housing needs from outside its area. When preparing the JCS, broad options were considered for meeting some of its housing needs in the Stroud area, but these were not pursued since the land was outside the JCS area. The JCS authorities assessed potential locations within Stroud district, but these did not perform well against sustainability objectives and highway infrastructure.
23. Although CBC & TBC have previously argued that land to the south of Gloucester (in Stroud) should be considered to help meet some of the housing needs of the JCS area, GCC maintains that this would conflict with the JCS strategy which seeks to focus growth elsewhere around Gloucester. There are clearly some differences of opinion on this matter, which reflect strategic pressures and raise issues about the relative merits of releasing Green Belt land around Gloucester or non-Green Belt land south of Gloucester in Stroud district; but it is essentially for the authorities concerned to determine the most appropriate strategy for their area. SDC did not seek to help meet the needs of Gloucester City within its area, since it was seeking to co-operate with GCC who wished to see those needs met elsewhere around Gloucester. SDC was never formally requested to assist in meeting any unmet housing needs from the JCS area during these earlier periods of plan preparation; it was not until August 2013 that the possibility of needing such assistance in the future was formally raised by the JCS authorities.

24. This does not suggest any lack of willingness on SDC’s part to co-operate or consider the issue of meeting some of Gloucester’s need within the Stroud area, simply that GCC and the JCS authorities as a whole did not consider this was a sustainable or appropriate option. This background highlights the difficulties when some authorities have differences of opinion, but it is not necessarily a failure of the DTC process as far as SDC is concerned. Most importantly, all the JCS authorities now agree that SDC has met the DTC.
25. The timescales of plan preparation are not ideal, with the SDLP coming ahead of the JCS, but the latest guidance on the DTC [PPG: ID-9-017] clearly envisages this eventuality and suggests appropriate actions, which largely reflect the processes undertaken by SDC and the JCS authorities. Both plans are now subject to independent examination, but the SDLP is more advanced in the examination process, with public consultation on Main Modifications now completed.
26. During the preparation of the Plan, SDC has engaged with the prescribed bodies on other strategic priorities relating to the environment, infrastructure and employment. SDC has worked closely with the Environment Agency (EA) when preparing the SDLP, producing a Stage 1 & Stage 2 SFRA, Level 2 Addendum and the SIDP, and when drafting detailed wording of the SDLP’s policies; EA is now satisfied that amended wording would overcome any outstanding concerns and considers that SDC has met the DTC requirements [PS/B28b; PS/D14abc; REX/B02].
27. Both Natural England and the Local Nature Partnership have been involved in the preparation of the Plan, including the supporting evidence and Habitat Regulations Assessment; any outstanding concerns have now been addressed [REX/B04]. Historic England has been consulted on the wording of several policies, and is satisfied that proposed amendments will address its concerns [REX/B03]. The LEP had some concerns about whether the SDLP would enable the emerging Strategic Economic Plan (SEP) to be delivered, but these concerns have now been overcome with the publication of the final SEP [REX/D13] and a review of the SDLP strategy against the key objectives and strategy of the LEP’s SEP.
28. On submission, there was some lack of highways and transport evidence, as highlighted in the Highways Agency’s representation, where they raised issues of DTC/legal compliance and soundness. However, during the preparation of the SDLP, there was extensive engagement with the Highways Authority (HA) and Highways Agency/ Highways England (HE); and since submitting the Plan, further meetings have been held and further transport work has been commissioned and completed, including transport and junction assessments. Both HE & HA are now satisfied that their concerns have been addressed and raise no objections to the Plan, either in relation to the DTC or soundness [REX/B05].
29. This indicates that, although some of the detailed assessments needed to support the strategy of the Plan and the strategic site allocations were not in place before the Plan was published and submitted, given the nature and extent of ongoing engagement with these prescribed bodies during the plan preparation period and suspension of the examination, and the fact that these issues are now resolved, this does not suggest fundamental shortcomings in the DTC process.
30. Consequently, having considered all the evidence, statements and discussions at the hearings, I conclude that SDC has met the legal requirements of the Duty to Co-operate in terms of maximising the effectiveness of the plan-making process and actively co-operating and engaging with relevant bodies on an ongoing basis.

Assessment of Soundness

Preamble

31. The SDLP establishes the strategic planning framework for Stroud district up to 2031, setting out the development strategy, with strategic site allocations, and establishing the principles and policy framework to guide development in the future. It sets the scene, with a vision for the future, leading to the development strategy, which sets out the key requirements for housing, employment and economic growth, concentrating development in the main settlements within the

identified hierarchy. More detailed policies cover the sub-areas of the district, with strategic allocations, followed by other core policies and delivery policies covering homes and communities, economy and infrastructure, environment, delivery and monitoring. As such, it is a comprehensive, strategic local plan, accompanied by an extensive evidence base, including sustainability appraisals, supporting documents, background papers, technical reports and studies, along with further evidence/statements submitted to the examination.

32. Preparation of the SDLP began in 2009, with consultation on Key Issues [CD/E1], Alternative Strategies (2010) [CD/E2], Preferred Strategy (2012) [CD/E3], Policies document (2013) [CD/E4], and the final Submission Plan (2014) [CD/A1]. A wide range of discussion papers were produced and meetings were held with many organisations and stakeholders, including neighbouring local planning authorities. During its early stages, the preparation of the SDLP had regard to the strategic context provided by the SWRSS, including its review, but this was formally revoked in May 2013. However, the SDLP is supported and justified by its own locally-derived evidence which does not rely on previous evidence or strategies in the SWRSS. This includes updated assessments of housing need, employment land, town centres and retail capacity, viability, accommodation for gypsies and travellers, transport, highways and infrastructure. The DTC process has partly replaced the former mechanisms of regional planning, effectively addressing cross-boundary issues. There has also been close liaison between SDC, LEP and neighbouring local authorities to ensure consistency of approach and in addressing cross-boundary issues.
33. In considering the soundness of this plan, I have not only had regard to the NPPF & PPG, but also taken account of more recent Government and Ministerial statements relating to planning and plan-making, including amendments to the Planning Practice Guidance (PPG), to which SDC has responded and addressed.

Main Issues

34. Taking account of the representations, supporting evidence, written statements and discussion at the examination hearings, there are **eight** main matters and key issues upon which the soundness of the SDLP depends.

MATTER 1: VISION & STRATEGIC OBJECTIVES

Key issue – Are the Vision for Stroud district and the Strategic Objectives justified, effective, locally distinctive and appropriate, reflecting the Sustainable Community Strategy, community views and issues raised during the preparation of the plan, and do they provide a sound basis for the development strategy and strategic policies in the Plan?

35. The SDLP sets out a Vision for the future of Stroud district, along with a series of Strategic Objectives to provide a tangible and measurable way of implementing the Vision [PS2/B02a-B03a]. The Vision is further supplemented by a series of “mini-visions” for each sub-area of the district later in the Plan.
36. The Vision is drafted in a clear and positive manner, reflecting the three dimensions of sustainable development set out in the NPPF (¶ 7). By referring to local characteristics, including environmental, social, economic and cultural features and recognising the specific challenges for each area, it is locally distinct. It is justified with a comprehensive evidence base, which reflects key visions, priorities and issues in the Sustainable Community Strategy (SCS) and in Parish Plans and Community/Parish Design Statements. Linked to the strategic objectives and providing the context and framework for the core policies of the Plan, it is effective and positively prepared. Although partly descriptive, it sets out the aspirations of how the Plan will promote new sustainable development, supporting economic and housing growth, while keeping the best qualities of the district. The subsequent strategic policies contain measurable targets against which the success of the Plan in achieving the Vision can be assessed. The Vision evolved through the plan-making process in a collaborative way, and SDC has made minor changes to the wording of the Vision to address relevant concerns raised during plan preparation, consultation and engagement.

37. Six Strategic Objectives identify the key strategic priorities in terms of homes and communities, economy and infrastructure, and environment and surroundings. They outline more specific and detailed ways in which the Vision will be taken forward, focusing on sustainable economic and housing growth, and providing the strategic framework for the development strategy and strategic policies that follow. They recognise the presumption in favour of sustainable development and are locally distinctive, reflecting the key issues identified for the district, including its particular environmental, social and economic qualities. They also reflect the different role, character and distinct identity of the settlements and parts of the district, in line with NPPF (¶ 17). However, amendments are needed to the detailed wording of two of the objectives, to reflect the requirements of statutory and prescribed bodies and ensure that they are sound **[MM001-002]**.
38. With these proposed changes, the Vision and Strategic Objectives are locally distinctive and appropriate for Stroud district, reflect the priorities of the SCS and the views of local communities, and provide a sound and effective strategic framework for the development strategy and core strategic policies.

MATTER 2 – DEVELOPMENT STRATEGY

Key issue – Is the Development Strategy for Stroud district soundly based, effective, appropriate, locally distinctive and justified by robust, proportionate and credible evidence, particularly in terms of delivering the proposed amount of housing, employment and other development, and is it positively prepared and consistent with national policy?

39. Chapter 2 of the SDLP sets out the overall development strategy for managing growth and development across the district to 2031, including the scale of housing and employment development, strategic growth and development locations, settlement hierarchy, place-making, development principles for the strategic sites and infrastructure and developer contributions.
40. Core Policy CP1 effectively confirms the presumption in favour of sustainable development enshrined in the NPPF (¶ 10-16).

Overall levels of housing and employment development

41. Core Policy CP2 sets out the overall amount of housing and employment development for the Plan period, and lists the strategic development sites; it also sets out the strategy for developments other than at the strategic sites, and includes a commitment to review the SDLP. The overall amount of housing and employment development for Stroud district was extensively discussed at the examination hearings, both in the initial examination and at the resumed hearings after SDC had reviewed housing and employment land needs. The main issue is whether the revised assessments of housing and employment needs are based on sound and objective analysis of the relevant evidence, which takes full account of the demographic, housing and economic factors, including the various assumptions, figures and methodology, in line with the latest national guidance.
42. As submitted, the Plan proposed to provide at least 9,500 new dwellings and 6,200 new jobs between 2006-2031. However, following the initial examination hearings, my Interim Conclusions found that SDC had not properly undertaken an objective assessment of housing needs for the district, having regard to the close relationship between Stroud and Gloucester city and the wider housing market area; there were also some deficiencies in the justification for the economic and employment strategy of the Plan and its relationship with the proposed housing requirement figure. As a result, SDC reviewed its housing and employment land needs, and proposed 11,200 new dwellings, along with 950 additional care home bedspaces and 58ha of employment land (2006-2031); the housing requirement figure was subsequently increased to 11,400 dwellings following discussions at the resumed hearing sessions.

Housing need

43. In order to significantly boost housing supply, the NPPF (¶ 47, 50, 159, 178-182) requires local plans to meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF. A Strategic Housing Market Assessment (SHMA) should assess the full housing need, working with neighbouring authorities where housing market areas cross administrative boundaries. The scale and mix of housing should meet household and population projections, taking account of migration and demographic change, address the need for all types of housing, including affordable housing, and cater for housing demand. Further guidance is given in the PPG [ID-2a], which confirms that DCLG household projections provide the starting point when estimating housing needs. There is no single method or data which determines the appropriate level of housing need; it is a matter of judgement based on an objective analysis of the available evidence, rather than on a forensic examination of each figure, estimate and assumption.
44. SDC has submitted detailed evidence and justification for its revised assessment of housing needs [PS/B10;B18b;E09-E10;E13-E14;E17; REX/B01;B06;B11;B13;B16;B19-B20; REX/D04-D05;D11; PS2/D31-32;D17]. SDC’s consultants took the latest DCLG 2012-based household projections as the starting point, and made adjustments to the population figures to reflect 10-year migration flows and Unattributable Population Change (UPC). UPC may be less significant at national level, but can sometimes have more implications at the local level. However, for Stroud district, the assumptions behind both these adjustments make little difference to the final figure, but provide an approach consistent with that adopted for the adjoining JCS authorities. Since it is agreed that the appropriate strategic housing market area covers Gloucestershire, it is important to adopt a consistent approach when assessing future housing needs. Since most of the SHMA work [PS/B18; PS/E13] covers the whole of Gloucestershire, this provides a comparable approach for each district.
45. Household formation rates (HFRs) are a key element in estimating future households and housing needs. SDC’s consultants initially adopted an approach that focused on the HFRs for the 25-34 age group, since this group is most affected by the changes between recent censuses, and assumed a partial return to the previous trends in the 2008-based household projections. However, the more recent 2012-based projections incorporate a higher rate of partial return to previous trends for this age group. Since the earlier 2008-based and interim 2011-based projections have been superseded by more recent projections, there is little reason to use the trends based on these earlier projections, particularly since, in Stroud, a full return to previous trends for all age groups under 65 would actually require fewer new homes and is considered unlikely in the short-medium term. The conversion ratio between new households and new dwellings is based on up-to-date evidence from DCLG and SDC [REX/D11]. On this basis, the latest assumptions and estimates [REX/B17] represent a reasonable and realistic approach for Stroud district, resulting in a demographic need for between 11,000-11,200 new houses (2006-2031), depending on which assumptions are used.
46. Both NPPF & PPG advise that other housing factors, including market signals, should also be taken into account. Earlier SHMAs [PS/B18] examined these factors and more recent reports [PS/E09b; PS2/D17] confirm that house prices in Stroud have moved in line with the rest of the county; average rents are slightly higher than the rest of the county, affordability ratios are little different, and overcrowding is lower than in Gloucestershire and England as a whole. Past delivery rates vary from 200-500 dw/yr, but this largely depends on the demand for and supply of housing, and there has been a significant “bank” of planning permissions over much of the period between 1990-2014; there is little evidence that the supply has been subject to particular planning constraints over this period. Some of the data only covers a 10-year period, but looking over a longer timeframe reveals that Stroud is little different from neighbouring authorities, including Gloucestershire. On this basis, market signals in Stroud are generally

no better or worse than neighbouring areas, and so I can see no need for any specific uplift in the housing requirement figure to reflect these factors.

47. SDC has revised its estimates of affordable housing [REX/B17; PS2/D17], identifying a need for 446 affordable units/year based on the PPG [ID-2a] approach; an earlier approach which suggested adjusted figures of 110 units/year took account of eligibility for affordable housing/housing benefit and **the role of the private rented sector, which is not in line with the PPG and is no longer advanced**. The unadjusted figure is slightly less than the total annual rate of proposed housing provision, but it is important to note the committed supply of 723 affordable units and the policy requirement for some 30% of all new housing to be affordable. In addition, **SDC has other proposals and initiatives to bring forward affordable housing through its own social housing programme, mortgage scheme, small sites review and rural exception sites, set out in the latest Housing Strategy [REX/D07]; Registered Providers and other specific schemes would also contribute to the supply of affordable housing.**
48. **The need for affordable housing is certainly a policy consideration that could influence housing targets, particularly in view of affordability issues, but it is distinct from the overall objective assessment of housing need, since the methodology and numbers are not compatible.** Although a modest increase in the overall housing requirement could be considered, **to seek to deliver all the affordable housing needed through the provision of market housing would result in unrealistic and undeliverable rates of housing development.** Housing for the elderly has been considered separately, **in line with the latest guidance in the PPG [ID-2a-021],** resulting in a specific provision for 950 additional Class C2 care home bedspaces (2013-2031) [PS/E09c]. Student accommodation is less relevant in Stroud district, and the SHMAs have fully addressed the mix of housing needed.
49. NPPF & PPG also advise that economic factors should be considered when assessing future housing needs. SDC has submitted further evidence on this matter, proposing an uplift to reflect economic factors, including jobs growth, and reconsidering the relationship between the housing and economic strategy [REX/B17; PS/E15]. This evidence examined job numbers, unemployment, economic activity rates, the size and nature of the local population and the need for jobs generated by the increase in population and households. It also considered economic growth forecasts, with the range of jobs and GVA growth reflecting that projected in the LEP’s SEP. Although various data and timescales could be used, in terms of future estimates of economic and jobs growth, it is important to use readily available evidence in a proportionate, realistic and reasonable manner.
50. Initially, SDC’s consultants favoured a mid-way approach, based on the assumed contribution of homes and jobs from Stroud for the whole of Gloucestershire, but this was replaced by a more objective approach based on economic forecasts of job sectors [REX/B17]. These estimates, adjusted to reflect Stroud’s circumstances, range from 10,600-12,200 new homes needed to meet alternative job scenarios, the mid-point of which is 11,400 new homes. Several participants press for a figure of 12,200 new dwellings within the plan period. This figure lies at the top of the economic scenarios and would represent a significant increase above demographic needs; it would also have negative effects in SA terms, and require new greenfield allocations or extensions to proposed allocations, further delaying the plan-making process. Moreover, in addition to the overall housing requirement, a further 950 bedspaces (2013-2031) are to be provided for elderly persons, increasing the overall provision of residential accommodation. More recent population and migration figures have been issued since SDC reviewed its housing needs, but PPG [ID-2a-016] confirms that housing assessments do not become outdated every time new projections are issued, particularly given the uncertainties involved in these latest estimates and the relatively small differences they make in the context of Stroud district.

51. In determining the objective assessment of housing need, much depends on the assumptions used for economic and jobs growth, but SDC has taken a balanced view, with an element of realism, practicality and pragmatism, looking at the pros and cons of the various forecasts. SDC originally considered that a figure of 11,200 new homes would represent the objective assessment of housing need, but agreed with me that a slightly higher figure of 11,400 new homes (2006-2031) would better align with the economic growth strategy, reflecting the mid-point between the various job scenarios, as well as providing a modest uplift to the demographic need to reflect the need for affordable housing.

Housing requirement

52. Throughout the preparation of the SDLP, SDC has considered several alternative levels of housing provision, and assessed these through SA. Most recently, when considering the latest housing requirement, SDC assessed seven levels of housing provision, ranging from 9,900-13,200 new dwellings. This work found that the lowest provision levels could be accommodated by increasing the capacities of sites proposed in the original SDLP; the highest levels would have serious site-specific adverse effects and could not be accommodated within the current development strategy; but intermediate levels of 11,200-11,750 dwellings could be accommodated within the current strategy, with additional allocations, such as the West of Stonehouse site; all these options were tested through SA. SDC has fully assessed and considered a reasonable range of realistic growth options based on various levels of housing provision, and has selected a housing requirement figure of 11,400 dwellings, which fully meets the objectively assessed housing need.
53. Cross-boundary housing provision is an important issue, particularly when the housing market area crosses administrative boundaries. This matter is dealt with in more detail under the Duty to Co-operate, earlier in my report. However, at this stage, it is important to note that the appropriate strategic housing market area covers Gloucestershire, which is addressed in the SHMA work [PS/B18; PS/E13]. The assessment of housing need carried out for Stroud is comparable and consistent with the approach adopted for other areas, including the JCS authorities. This enables a county-wide view to be taken across the wider housing market area on the overall level of housing required to meet population and household needs and support economic growth, having considered issues such as commuting and the inter-relationship between the local housing markets.
54. Moreover, at present there is agreement between Stroud and the JCS authorities that each area should fully meet its own identified housing needs within its own area; there are currently no unmet needs from Stroud that have to be met elsewhere or from neighbouring authorities that have to be met within Stroud [REX/B09]. If the situation changes, then the commitment to review the SDLP in Policy CP2 comes into play; this would consider the nature and scale of any unmet needs and determine how and where they should be met, working together with the relevant authorities under the Duty to Co-operate.
55. I therefore consider that a housing requirement figure of 11,400 new homes (2006-2031) represents an objective, realistic and deliverable housing requirement figure, which meets demographic needs, reflects housing market signals, and includes a modest uplift to reflect the need for affordable housing, economic trends, local policy objectives and other relevant factors.

Housing supply

56. Turning to housing supply, recent 5-year land supply assessments [PS/E14] indicate a deliverable supply of just over 7 years, including existing commitments and a realistic proportion of the contribution expected from the strategic sites proposed in the SDLP within the current 5-year period. These figures have been confirmed in the latest assessment [PS2/D32], which specifies a 5-year requirement of 2,674 dwellings, compared with a deliverable supply of 3,762 dwellings,

equating to a current supply of 7.03 years. Although the detailed delivery of these sites may change, there is sufficient “headroom” in these figures to ensure that the 5-year housing land supply requirement can be met, supported by evidence in the SHLAA [CD/B4]. This figure includes a 5% buffer, as required by the NPPF (¶ 47), added after the shortfall in provision during the earlier years of the current plan period; it also includes a modest allowance for windfall sites, reflecting past rates of provision, an allowance for dwellings unlikely to be built, and a discount for small site permissions. Assuming that identified commitments and strategic sites come forward as anticipated, using realistic assumptions about timing, build-rates and delivery, I am satisfied that sufficient sites have been identified to meet a 5-year supply, in line with the guidance in the PPG [ID:3-033].

57. The latest evidence on past housing provision [REX/B06; REX/B13; PS/B10; PS/B13] does not suggest that there has been a persistent under-delivery of housing in Stroud which might justify a 20% buffer, as confirmed in my Initial Conclusions [PS/D21]. Moreover, the proposed rate of housebuilding over the rest of the Plan period (473 dw/yr) would represent a significant (almost 20%) increase compared with average completion rates between 1991-2013 (382 dw/yr). The housing trajectory [REX/D05e] shows that housing delivery is “frontloaded”, with a surplus in provision to ensure that minimum housing targets can be met well before the end of the plan period. Taking account of completions within the current plan period, just over 7,560 new houses need to be built up to 2031, of which almost 4,000 are under construction, permitted or otherwise committed, leaving just over 3,600 to be provided, including those at the proposed strategic allocations [PS2/D31-D32]. This excludes any future windfalls on large sites and small-scale windfalls in the smaller settlements, as well as any provision from future neighbourhood plans, giving further flexibility. There is no specific phasing for housing development, but the housing trajectory uses reliable information, discussed with developers and taking account of lead-in times and build rates, to establish a realistic and deliverable programme of new housing development.

Economic strategy and employment land requirement

58. Following the suspension of the examination, SDC undertook further work on the SDLP’s economic strategy, including a revised assessment of employment land needs and economic forecasts [PS/E10; E15-E16; REX/B07; B14; B17; D04a; D08a]; this resulted in a revised provision of 58ha of employment land and between 6,800-12,500 new jobs (2006-2031) **[MM009]**. The main issues are whether these revised assessments reflect the latest economic forecasts, relate to the revised housing strategy and reflect the LEP’s economic strategy, and whether they are appropriate, effective, justified, positively prepared, soundly based and consistent with the latest national guidance.
59. In carrying out this work, SDC has updated its employment needs assessment, using historic rates of land take-up and drawing on recent economic forecasts, consistent with those used to establish the housing requirement figure, including employment growth projections, activity rates, labour supply, employment land needs and past and likely future take-up of employment land [PS/E15]; this approach is consistent with the guidance in the NPPF & PPG and is comparable with that adopted for the neighbouring JCS authorities. It has also reviewed current employment land availability, and reassessed future land needs, using various models and data, not only in quantitative and qualitative terms, but also reflecting business needs on both a sectoral and spatial basis; this ensures there is a spread of employment land across the district to meet market needs, whilst reflecting the LEP’s economic focus on the M5 corridor. Strategic mixed-use site allocations also help to ensure that new jobs are provided as housing progresses.
60. The SDLP proposes some 26ha of new employment land, which with existing commitments, would more than meet the future need for employment land based on historic take-up of land; it would also meet likely economic demand and meet both high and low economic forecasts. The proposed provision of employment land can be delivered within the current plan period, and provides a surplus

against future needs. Although the current supply only includes a few larger sites, further proposed provision would increase this amount. The proposed increase in employment land and the wider range of jobs growth is a combination of factual updates and reflects the range of economic forecasts considered. I deal with specific employment sites later in my report.

61. The focus of the strategy in policy terms has shifted slightly, with an overall target of 58ha of employment land, rather than a specific number of new jobs. Given the difficulties of precisely estimating and providing the required number of new jobs, an approach which relies on the historic take-up of land and economic forecasts of future employment land needs is more reliable and appropriate for Stroud district. Hence, a range of possible jobs growth (6,800-12,500) is more appropriate than a specific figure, although the proposed amount of employment land could easily generate up to 12,500 new jobs [PS/E15]; a lower rate of jobs growth would not reflect the LEP’s SEP, and would merely continue past trends without boosting economic growth.
62. SDC’s revised economic assessment has regard to the wider economic area of Gloucestershire, including the LEP’s Functional Economic Market Area, and has considered cross-boundary factors such as commuting and the inter-relationship between jobs both within and outside Stroud district. SDC has also reassessed the relationship of the SDLP with the LEP’s SEP, in terms of economic growth forecasts and the spatial and sectoral provision of employment land; the SDLP is now fully aligned with the LEP’s economic objectives and growth forecasts set out in the latest SEP [PS/E15; PS/D6ab/D18a]. The level of jobs growth proposed in the SEP (0.8%) lies in the mid-range of the SDLP’s assumptions (0.63-1.16%), whilst GVA growth in Stroud is in line with that predicted in the SEP over the whole LEP area. The amount of employment land proposed would also comfortably meet, and probably exceed, jobs growth projected in the SEP, whilst providing a balance between jobs and new housing within Stroud district.
63. On this basis, the SDLP, as amended, is both aspirational and realistic in making provision for 58ha of employment land over the plan period, based on historic take-up and future trends; this reflects economic forecasts aligned with the housing requirement and wider LEP economic strategy, and could provide up to 12,500 new jobs, consistent with the overall housing and economic strategy. As such, it represents an appropriate, effective, positively prepared, justified and soundly based approach, which is consistent with the latest national guidance.

Other elements of Policy CP2

64. The strategic development allocations are also listed in Policy CP2, including the amendments to reflect the latest locations and capacities **[MM007/013]**; these are dealt with in the next section of my report.
65. Policy CP2 also sets out the strategy for development other than at the strategic sites, in line with the settlement hierarchy. This is a key element of the overall strategy, which aims to concentrate most new development at strategic locations with a mix of uses at the larger, more sustainable settlements; limiting the scale and location of other new development assists in achieving a sustainable pattern of development throughout the district. Other developments could take place within settlement limits and within designated employment areas and town centres, whilst appropriate development, such as rural exception sites and sites identified in neighbourhood plans, could take place outside settlement limits. Moreover, much development has already taken place or is committed at some of the smaller settlements, both before and during the current plan period, helping to meet future development needs; the strategic sites would represent less than 30% of the total future housing growth, with more than 70% taking place outside the strategic sites in accordance with the settlement hierarchy.

66. This approach provides the flexibility to meet locally identified or unexpected future needs without preventing lower-tier settlements from achieving their roles within the hierarchy or undermining the overall development strategy; in the context of a local plan which fully meets the identified housing requirement, to allow unrestricted development outside existing settlement limits could undermine the established strategy of managing growth in the district. This approach also reflects the need to effectively manage patterns of growth and focus significant development in locations which are or can be made sustainable, in line with NPPF (¶ 14; 17); it is effective, fully justified, soundly based and consistent with national policy.
67. Another key element of Policy CP2 is the commitment to review the SDLP to consider the housing needs of neighbouring planning authorities; a similar policy is included in the submitted JCS. This review process has been prepared in discussion with the JCS authorities [REX/B09] and is an effective, justified and pragmatic contingency measure to address the possibility of future unmet development needs arising from outside or within Stroud district. This approach is supported by the Written Ministerial Statement of 21 July 2015, which confirms that a commitment to an early review may be an appropriate way of ensuring that a local plan is not unnecessarily delayed by seeking to resolve matters which are not critical to its soundness or legal competence as a whole; it also helps to ensure that the SDLP is in place at the earliest opportunity, another key element of ministerial guidance.
68. Although there is no specific timescale to complete the review, this provides a flexible and responsive approach with a firm commitment to commence the review of the SDLP within 5 years of adoption, without imposing rigid deadlines; it also recognises that the completion of the review may be out of SDC’s hands if it requires independent examination. At present, there is no need for an immediate review of the SDLP, but the approach provides a clear “trigger” for such a review. Alternative approaches, such as over-allocating land or identifying “reserve” sites, would delay the local plan process, introduce uncertainty and tend to draw the focus away from the overall development strategy. Amendments to this clause of the policy and the accompanying text **[MM011/014]** would ensure that it provides an effective and responsive commitment to this review.

Settlement hierarchy

69. Core Policy CP3 sets out the settlement hierarchy for the district, ranging from the larger Accessible Local Centres in the 1st tier (Stroud, Stonehouse, Cam & Dursley) and Local Service Centres (2nd tier) to Unclassified Settlements (5th tier). The main issue is whether this establishes an appropriate, effective, sustainable and soundly based settlement hierarchy which reflects the existing and future role of these settlements, helping to concentrate growth in those settlements that already have a wide range of services and good accessibility.
70. The settlement hierarchy is a key element of the development strategy, helping to provide the framework and determine the distribution of future growth across the district [PS2/B02b; PS/B10]. The identification and categorisation of individual settlements stems from an earlier Rural Settlements appraisal and the previous local plan, but this was reviewed in 2010 and updated in 2013 [CD/F11; PS/D8]; the final classification of settlements was confirmed in the 2014 Settlement Role & Function Study [PS/E21] and in later SA work.
71. First tier settlements include the district’s largest settlements, with a strong employment role and key strategic roles in providing retail and community facilities; they are some of the most accessible settlements and are suitable for strategic growth. 2nd tier settlements comprise the next largest settlements, which have important employment and service roles. 3rd tier settlements vary in size, but have a limited range of services and facilities, whilst 4th tier settlements have minimal facilities, with no strategic retail or community facilities; 5th tier settlements lack basic facilities to meet daily requirements. As such, the proposed settlement hierarchy is appropriate, effective and justified with up-to-

date evidence, and reflects the existing role each settlement plays, as well as identifying the more sustainable and accessible settlements with the widest range of services where strategic growth should be concentrated.

72. The detailed categorisation of settlements involves some judgements. Five tiers of settlements could be seen as too many, but it helps to distinguish the roles the various settlements play in the hierarchy and identify those which are more appropriate for strategic growth. Some participants press for levels of growth to be apportioned to each settlement or tier of settlements. However, this would reduce flexibility, since the level of development depends more on the suitability, availability and developability of potential sites; many of these settlements have important constraints, including landscape, AONB, topography and infrastructure, which may preclude large-scale or strategic developments. The overall strategy focuses most large-scale and strategic development at the 1st-tier settlements, which inevitably results in settlements lower down the hierarchy being allocated less development. The hierarchy also recognises the future role that some expanding settlements will play, such as Hunts Grove and Stonehouse, where major strategic developments are proposed.
73. The hierarchy identifies the relative levels of growth, ranging from significant to very limited, with the flexibility to accommodate specific strategic allocations and other proposed developments. Moreover, the provision of development within each settlement does not rely on future allocations in subsequent plans (such as neighbourhood plans); the SDLP aims to fully meet the identified housing and employment land requirements. Some parties are concerned that the settlement hierarchy would unduly restrict development at the lower-tier settlements. The recommended amendment **[MM015]** would clarify the impression that no development is envisaged in these settlements by confirming that there may be scope for very limited development; this would reflect the general presumption in favour of sustainable development at all settlements.
74. As for specific settlements, since Stroud is by far the largest settlement in the district, there is a case to elevate it above other settlements in the hierarchy. However, given the physical, landscape, topographical and environmental constraints in and around the town, this could imply that the town should accommodate more strategic development in inappropriate peripheral locations. The SDLP acknowledges that Stroud is the principal settlement, providing a wide range of strategic facilities, but this role is shared by other settlements in this tier of the hierarchy; all satisfy the criteria for inclusion as 1st-tier settlements, and grouping them together provides flexibility in the spatial distribution of new development. The hierarchy is not simply based on population, but also relates to the role each settlement plays, including strategic employment, retail, community facilities, accessibility and overall sustainability.
75. Some parties argue that Gloucester should be referred to as a major city centre which serves a strategic role for Stroud district. The SDLP recognises the existence of Gloucester, but it is outside the plan area and the SDLP has little influence over its future role or potential to accommodate growth; this wider issue has been considered in the SA work [REX/B15b]. Hunts Grove is a committed large-scale development lying to the south of Gloucester, and the SDLP makes effective use of this existing allocation and its associated planned infrastructure and facilities, and consolidates the development area.
76. Some parties consider particular settlements, such as Berkeley, Frampton-on-Severn, Haresfield, Kingswood, Leonard/Kings Stanley, Minchinhampton, Nailsworth, Painswick and Wotton-under-Edge, should be included in higher or lower tiers of the hierarchy, or be allocated more strategic development. The identification of particular settlements within each level of the hierarchy is a matter of judgement, but SDC has adopted a consistent and logical approach, which is justified with up-to-date evidence based on the existing role of the settlements, the level of strategic and other services and facilities, accessibility and overall sustainability. In many cases, these settlements have already accommodated significant amounts of development in the past, including earlier

within the current plan period [PS2/B03], and it is now appropriate to re-focus strategic development at the most appropriate and sustainable larger settlements. As an exception, strategic development is allocated at Sharpness to reflect the current proposals to regenerate the docks, which would enhance its accessibility and overall sustainability.

77. Overall, SDC has achieved a reasonable balance in terms of the settlement hierarchy, concentrating new development at those larger, more sustainable settlements which have the potential to accommodate strategic development. With the recommended amendment **[MM015]**, Policy CP3 establishes an appropriate, effective, sustainable and soundly based settlement hierarchy which reflects the existing and future role of these settlements.

Other development strategy policies

78. Core Policy CP4 sets out the place-making requirements for new development, referring to the mini-visions and Guiding Principles for each sub-area. The main issue is whether the place-making and design criteria are sufficiently clear and effective, or unduly onerous. Policy CP4 expects development proposals to meet three main criteria relating to integrating into the neighbourhood, place-shaping and creating safe and legible spaces; these are not unexpected or onerous requirements, and reflect the NPPF (¶ 58). References to the Guiding Principles reflect policy requirements and objectives that appear in other policies in the SDLP; reference to the mini-visions ensures that development proposals help to contribute to the plan’s locally distinctive aspirations for each sub-area. Recommended amendments to the policy **[MM016-017]** would clarify its application of the policy, and ensure that it is clear and effective.
79. Core Policy CP5 outlines the development principles for strategic sites, setting out specific requirements for their siting, design and construction. The main issue is whether these specific requirements are appropriate, effective, fully justified and soundly based, including the need to produce a master-plan and a statement of construction principles. However, these requirements reflect many of the objectives of national policy (NPPF; ¶ 17, 37-37, 57-59, 66 & 93-98), as well as those set out in other policies in the SDLP. They are needed to assess the scale, character and likely impact of strategic developments, but provide the flexibility to apply them as appropriate to particular proposals, without adversely affecting deliverability or viability. Design and quality of development needs to be managed throughout the development process, and master-planning, design codes and sustainable construction techniques are established tools for creating high quality strategic developments. A recommended amendment **[MM018]** would clarify the transport and accessibility criterion, and ensure that the policy is effective, appropriate, fully justified and soundly based. More detailed aspects of design and construction are addressed under Policy ES11.
80. Core Policy CP6 sets out the framework for securing infrastructure and developer contributions. The main issue is whether this approach is appropriate, clear, effective, justified with evidence, reasonable, flexible and consistent with national policy. Policy CP6 confirms SDC’s commitment to work with developers and infrastructure providers to ensure that the necessary infrastructure is in place to meet the needs of development at the right time. The IDP [CD/C6; PS/E23] identifies the critical elements of infrastructure required by the development strategy, whilst Policy CP6 provides the mechanism to ensure that strategic developments deliver such infrastructure, along with any necessary mitigation measures. The wording is flexible enough to take account of the CIL Charging Schedule when it is finalised. The Viability Study [CD/F19] assesses the impact of all policy requirements on the viability of development proposals in the SDLP, including infrastructure, and confirms that viability is not compromised. Recommended amendments **[MM019-020]** refer to other guidance and confirm that viability and site-specific circumstances will be considered when determining the scale and nature of infrastructure provision. With these amendments, the approach to securing developer contributions for infrastructure is appropriate, clear, effective, justified, reasonable, flexible and consistent with national policy.

Flexibility and strategic guidance

81. The SDLP has several built-in elements that allow flexibility and responsiveness, including the review mechanism in Policy CP2, future development proposals likely to come forward from neighbourhood plans (of which 13 are now underway) to address locally identified needs and respond to changing circumstances, and future work to be undertaken on many of the specific site allocations in the SDLP. The housing and employment land requirements are “targets” rather than maximum figures, with terms such as “about” or “at least”; large-scale windfalls, small-scale windfalls at lower tier settlements and rural “exception” sites are excluded from the provision figures, and the number of new jobs is specified within a wide range (6,800-12,500). The SDLP also proposes more new housing than is needed to meet the identified requirement, providing further flexibility.
82. The SDLP provides sufficient strategic guidance to direct future development and inform development decisions, by specifying the scale, location, timing and implementation of new strategic developments, particularly in the place-making section of the Plan, as well as providing the policy framework for progressing developments and making development decisions. The Key Diagram and other sub-area diagrams, along with the Policies Map, specify the locational elements of policies and proposals, including the strategic allocations, settlement hierarchy and strategic transport network. Recommended amendments to the Key Diagram and other diagrams would update their content and ensure that they reflect the latest version of the SDLP **[MM021-023; 039]**.

Alternative strategies, options and sites

83. The consideration of alternative strategies, options and sites featured regularly in the discussions at the hearing sessions. SDC has explained how alternative strategies, options and sites had been considered during the plan-making process [PS/B10]. Reasonable alternative strategy options were identified and assessed at the Key Issues stage [CD/E1], including concentration and dispersal options; at Alternative Strategies stage [CD/E2; CD/F6/F8], when 7 alternative growth scenarios were assessed using a combination of themed distribution options to identify the best performing scenario; at Preferred Strategy stage [CD/F15-F16; CD/D7; CD/E3], where alternative strategies to identify a preferred approach were assessed, including alternative site locations; and at Submission Plan stage [CD/F17-F18; CD/A4a], where final appraisal, including alternative growth and distribution options were assessed. Alternative growth scenarios were also assessed when higher housing requirement figures were identified in 2014 [PS/E17-E18], along with specific site alternatives. As confirmed in the assessment of legal requirements, the consideration of alternative strategies, options and sites were assessed in SA reports, including at the later stages of plan-preparation.
84. These assessments have considered not only reasonable alternative strategies, but also alternative locations and spatial distributions of development, including in the south of Gloucester fringe and throughout the whole of Stroud district. SDC has considered all the alternative and additional sites put forward by landowners and developers at various stages of the plan-making process. In saying this, I particularly note the PPG guidance [ID:11] which does not require a specific set of alternatives to be considered at every stage of the process, providing reasons are given for selecting and rejecting particular alternatives. Having considered all the evidence, there is no doubt that SDC has considered all reasonable and realistic alternative strategies, scenarios, options and sites at various stages throughout the preparation of the SDLP, with a full assessment of their advantages of disadvantages and reasons for rejecting and selecting particular alternatives.
85. Consequently, as amended **[MM001-021]**, the development strategy is effective, locally distinctive and appropriate for Stroud district. It is justified with robust, proportionate and credible evidence, particularly in terms of the proposed amount of housing and employment development. It is also positively prepared and consistent with national policy, and provides a soundly based framework for the strategic policies and proposals that follow. Similarly, the underlying strategy of

concentrating most new development at strategic mixed-use developments focused on the larger, more sustainable settlements, represents an appropriate, effective, deliverable and soundly based strategy, resulting in a sustainable pattern of development, in line with national policy.

MATTER 3 – MAKING PLACES – STRATEGY FOR THE SUB-AREAS

Key issue – Is the development strategy for the sub-areas of Stroud Valleys, Stonehouse Cluster, Cam & Dursley, Gloucester Fringe, Berkeley Cluster, and the Severn Vale, Wotton and Cotswold Clusters appropriate, effective, deliverable, sustainable, viable, fully justified and soundly based, including the proposed strategic site allocations?

Stroud Valleys

86. The strategy for the Stroud Valleys focuses most new development at several brownfield sites within Stroud or along the Golden Valley, which are partly or mainly vacant, disused or underused [PS2/B02c; PS2/B03a-d/f]. In the submitted Plan, these sites were expected to provide 300 new dwellings, whilst maintaining jobs at the current level as part of mixed-use schemes. SDC has reviewed the capacity of these sites, and now proposes 450 new dwellings as part of mixed-use developments, subject to viability and site-specific considerations [**MM024/026/029-030**]. The main issue is whether the strategy for the Stroud Valleys is appropriate, effective, deliverable, viable, fully justified and soundly based.
87. Stroud is the largest of the first-tier settlements in the district, with an important strategic retail, community and employment role, and good accessibility, with bus services and a railway station. At first sight, an allocation of some 450 dwellings may seem somewhat modest, but it is important to recognise the physical and policy constraints within this area, including the landscape and topography of the valley in which Stroud lies and the proximity of the Cotswolds AONB [CD/D14]. It is also important to consider the practicality of redeveloping some of these brownfield sites, particularly where access, flood risk, viability and location are concerned. The SHLAA [CD/B4] identified a theoretical capacity of up to 1,000 dwellings on brownfield sites within the valley, but after considering site constraints and the need to retain a balance between housing, employment and other uses, this was reduced to 300 dwellings; following more detailed work and discussions with developers, this figure increased to 450 dwellings, reflecting the constraints and characteristics of the sites and the likely form of development.
88. In terms of the overall development strategy for the Stroud Valleys, SDC has achieved a reasonable balance between maximising the development capacity and the practicality of delivering the selected sites, whilst ensuring that the proposals help to meet housing needs and retain existing employment opportunities. The re-use and redevelopment of existing sites and buildings is an important policy objective, both at local and national level, which the SDLP sees as its main focus in the Stroud Valleys.
89. All the proposed sites have their own characteristics, opportunities and constraints, but most are being actively promoted by landowners or developers. Over 50% of the total number of dwellings proposed for the Stroud Valleys are currently being actively promoted through the planning system, with the rest being progressed through master-planning or coming forward later in the plan period. Although many of these sites have key challenges and constraints, there is little conclusive evidence to suggest that appropriate, deliverable and viable schemes, in line with the expectations of the policies, will not realistically come forward within the current plan period.
90. Many of these sites are subject to flood risk, but SDC has undertaken much work to meet the requirements of national policy and the EA [PS/E25; REX/B02; REX/C01]; amendments to the policies and the supporting text are necessary to ensure that these matters are properly addressed [**MM025/027-028/031/033-037**]. Wider strategic solutions for the River Frome floodplain are being considered, supported by the LEP and HCA [PS/E12]. Wastewater and sewerage issues are

being addressed with the relevant bodies, with committed funding. The redevelopment of several of the proposed sites will help to provide the necessary infrastructure and mitigation measures. Restoration of the Stroudwater Canal is another benefit of these proposals. Some of the sites have important heritage and biodiversity constraints, but the evidence shows that these are capable of resolution or mitigation (including potential impact on the Rodborough Common SAC), and there are no outstanding objections from NE or EH/HE [REX/B03-B04].

91. The IDP [CD/C6; PS/E23] sets out the infrastructure requirements for these sites and does not indicate any particular deficiencies in terms of the capacities of schools or other services that cannot be addressed. The need to retain existing employment opportunities is an important element of the strategy, supported by the ELS [CD/C4; PS/E15], but amendments to Policy SA1 and Policies CP11 & EI2 are needed to provide sufficient flexibility to ensure that viability and site-specific aspects are properly considered [**MM029/032/097/106**].
92. In response to concerns about the impact of the proposed developments on the road and transport system, SDC has undertaken some further work, which identifies the necessary junction improvements [PS/E22; PS2/B06]. The housing trajectory recognises that some sites will not deliver housing until the mid-later parts of the plan period, and the latest evidence suggests that likely delivery is within the expected timescale. Viability studies [CD/F19] confirm that these are challenging sites, but developers seem keen to promote developments on most of them and external finance may be available to address critical constraints, such as flooding. These issues also have to be seen in the context of the importance of regenerating existing brownfield sites in the Stroud Valleys, including successful past performance in bringing forward former mill sites.
93. Turning to the individual sites, *Land at Dudbridge* (Policy SA1a) has planning permission for a new foodstore with ancillary uses, in line with the policy. *Land at Cheapside* (Policy SA1b) is proposed for 30 new dwellings, which reflects current discussions with landowners who confirm that a successful scheme can be delivered despite the acknowledged constraints of the site [PS2/B03c]. *Land at Ham Mill* (Policy SA1c) is now proposed for 100 new dwellings and employment uses, which reflects current discussions with landowners who envisage housing, offices, community facilities and light industrial/retail uses [PS2/B03f].
94. *Brimscombe Mill* (Policy SA1d) is proposed for 40 dwellings and employment uses; owners confirm that the site is available for redevelopment, with a viable scheme that could come forward within 2-3 years [PS2/B03d]. The key constraint is the need to identify an engineering solution for the canal and river flood alleviation scheme at Brimscombe Port, which could involve a cross-site solution. SDC manage the *Brimscombe Port* site (Policy SA1e) on behalf of its owners; this currently comprises a range of office, industrial, storage and leisure uses, most of which are on short-term leases. Feasibility work is underway, and engineering solutions for the canal and river flood alleviation scheme are being progressed, in line with the Flood Risk Sequential Test [PS/E25], with funding opportunities from the LEP & HCA. Although this is a challenging site, there is little evidence to suggest that it is not capable of delivering 150 new dwellings, with canal, tourism and employment uses towards the mid-latter part of the plan period.
95. *Wimberley Mills* (Policy SA1f) is proposed for 100 new dwellings and employment uses. The site has constraints, including issues relating to the River Frome and vehicular access, but these could be overcome. Current discussions focus on a residential-only scheme, without any employment or other uses. The developers maintain that a mixed-use scheme would not be viable, but there is sufficient flexibility within the revised policy framework to ensure that an appropriate scheme could come forward within the current plan period. *Dockyard Works* (Policy SA1g) is proposed for 30 dwellings and employment uses. The existing business uses are expected to continue, but continued commercial use and the release of land for residential purposes could come forward in the future. This is a longer term site, but there is little to suggest that the site could not come forward for development within the current plan period.

96. Some developers consider more development should be allocated to the Stroud Valleys, particularly since Stroud is the largest of the first-tier settlements. SDC has considered various alternative strategies, growth scenarios and levels of development in the Stroud sub-area throughout the plan-making process, including at the latest stage when housing figures were increased. Given the existing constraints, it is difficult to identify sites that do not have some policy, physical or environmental constraints, including impact on the Cotswolds AONB.
97. Taking account of completions, commitments and proposed developments, the Stroud Valleys sub-area is expected to accommodate some 14-18% of the planned total housing supply, which is significantly less than the sub-area’s share of the population, but not much less than the current proportion of housing. This represents a reasonable balance between making the most effective use of brownfield sites, whilst recognising the practical constraints to their delivery and the need to retain their employment role, where possible. It also represents a realistic level of development, given that the strategy is focused on redeveloping brownfield sites within the valley. To increase the amount of development in the Stroud Valleys much further would undoubtedly require greenfield sites, which themselves have policy, physical and environmental constraints. As regards other settlements in the area, such as Nailsworth and Minchinhampton, these have landscape/AONB or other constraints, with limited opportunities for potential development. I consider sites outside the main area of the Stroud Valleys (including Aston Down) and specific “omission” sites later in my report.
98. Consequently, with the proposed amendments [**MM024-037**], the development strategy for the Stroud Valleys is appropriate, effective, deliverable, viable, fully justified and soundly based.

Stonehouse Cluster

99. In the submitted Plan, the strategy for the Stonehouse Cluster proposed new employment land (9.3ha) north of Stroudwater Industrial Estate. However, following the increase in the housing requirement, SDC now proposes a sustainable urban extension as a vibrant new community on land to the West of Stonehouse, including 1,350 new dwellings and 10ha of employment land, with a local centre, education and community facilities, open space, infrastructure, improved connectivity with Stonehouse town centre and contributions to bus and community services, off-site highway works and reopening of Stonehouse (Bristol Road) railway station, along with amendments to the mini-vision and the Guiding Principles [**MM038-041/ 044-046**] [PS2/B02d; B03g]. Locally, this is one of the most controversial proposals in the amended SDLP, and the main issue is whether the amended strategy for the Stonehouse Cluster, including the proposed urban extension at West of Stonehouse, is appropriate, effective, deliverable, sustainable, viable, positively prepared, fully justified and soundly based.
100. Stonehouse is a first-tier settlement, with 12% of the district’s population; it is a major employment centre, with a wide range of strategic and local retail, commercial and community facilities in the town centre, and good public transport links to Stroud and elsewhere, including a railway station. It is one of the most sustainable and accessible settlements, with a large economically active population. Although not far from the Cotswolds AONB, it is not affected by other significant policy, physical or environmental constraints, and is eminently suitable for some strategic growth. Potential development locations to the east and north are constrained by the proximity to the AONB, whilst the main A419 and canal/river corridor constrain development to the south.
101. The proposal for a sustainable urban extension at West of Stonehouse (WoS) has been considered on several occasions both before and during the preparation of the SDLP. Indeed, WoS was proposed as a housing allocation in the Alternative Strategies in 2010 and Preferred Strategy in 2012 [CD/E2-E3; CD/F15], and subject to SA [CD/F6; CD/F16], but was removed from the submitted SDLP, since it was not needed to meet the housing requirement figure identified at that time. However, SDC reintroduced WoS into the Plan when the housing requirement was increased

after the Plan was submitted and initially examined. The site performed well in the consideration of alternative strategies and options throughout the plan-preparation period [CD/F6; CD/F15-F16; REX/B15b], and in other studies [CD/D7].

102. The WoS proposal would deliver 15% of the district’s planned housing provision, commensurate with the existing population of Stonehouse and helping to provide a balanced distribution of housing across the district. It would fully accord with the overall development strategy, involving a large mixed-use urban extension to one of the district’s main settlements, delivering both employment and housing (including over 400 affordable homes), providing significant infrastructure to support and accommodate the development, along with associated facilities. The scale and mixed-use nature of the proposal provides the critical mass to create a viable sustainable urban extension, with its own essential services, whilst improving connectivity with Stonehouse town centre and its wider range of facilities would ensure that it is integrated with the existing settlement.
103. The WoS proposal is supported by developers, who are actively progressing the scheme through a planning application, masterplan, agreements and detailed assessments [PS2/B05]. As a large-scale greenfield development, it inevitably has a lead-in time for site preparation and infrastructure, but the latest evidence points to a realistic building rate that would see the development completed within the plan period. No fundamental site-specific or technical constraints have been identified to prevent or delay this proposal and both the Viability Study [CD/F19] and the developers [PS2/C12c] confirm that it is viable and deliverable.
104. SDC has fully considered the environmental impact of the proposal, along with site constraints and infrastructure requirements. The Landscape Appraisal Study [CD/D14] confirms that the site has a low-medium landscape sensitivity to change. Although the development would be visible from the nearby scarp on the edge of the Cotswolds AONB, it would be seen in the context of other existing developments, including Stonehouse, in the Severn Vale and on the southern fringe of Gloucester, without significantly affecting the setting of the AONB. The size and nature of the development site would enable landscape, conservation and heritage issues to be addressed in its detailed design and master-planning, including enhanced structural landscaping. The site is relatively unconstrained in terms of landscape, heritage and biodiversity, with opportunities to conserve the character of the small villages of Nastend and Nupend and enhance ecological networks [REX/B15b]. The HRA also confirms that the proposal would not adversely affect the Rodborough Common or Severn Estuary SPAs [PS/E20a]; neither NE nor EH/HE objects to the proposal [REX/B03-B04].
105. A small part of the site is subject to flood risk, but this could be mitigated in the detailed design of the development; EA does not object to the proposal [REX/B02]. Although there would be extra traffic along the M5/A38/A419, this is unlikely to breach current guidelines or lead to significant negative effects on overall air quality. There would be some loss of agricultural land, but other better quality land would remain; any archaeological interests could be recorded and mitigated. Recommended amendments to the detailed wording of Policy SA2 [**MM044-045**] would ensure that these and other detailed issues are properly addressed.
106. There is considerable local concern about the implications of the additional traffic that would be generated by this proposal. SDC has undertaken further work on this matter [PS/B26; PS2/B06], and further traffic and transport assessments would be undertaken by the developers. The latest Junction Capacity Assessment [PS/E22] confirms that no further improvements would be needed to the M5 (J13) and A419 junctions in addition to those already planned, some of which are already committed, programmed for completion in 2019, with funding supported by the LEP/SEP [PS/D6a; PS2/D10]; other off-site road improvements would be delivered and funded by the proposed development.

107. The basis and methodology of the transport and traffic assessments, including traffic generation, distribution and future growth levels and impact on roads and junctions, have been undertaken in line with national guidance [PPG; ID:54] and endorsed by HE & HA, who now have no objections to the proposed development [REX/B05; PS2/C02]. The transport assessments assume a 6% trip rate modal shift from private car to public transport, to ensure sustainable transport, hence the need for contributions to bus services and rail infrastructure. There are no serious inconsistencies between this work and that carried out for the SA Addendum report [REX/B15b]. The impact of the proposed development on local roads and junctions would be addressed in more detailed transport and traffic assessments as part of the development process.
108. The existing railway lines to Stroud and Bristol provide a physical barrier to access to Stonehouse town and town centre from the WoS site, with a level crossing and narrow bridges. Significant improvements would be needed to improve pedestrian and transport connectivity, particularly to cross-railway links, but this is addressed by amended Policy SA2 [**MM044**]. The need for a new/re-opened railway station at Stonehouse (Bristol Road) features in the LTP and several studies, but there may be some doubts about its viability and feasibility in the short-term. Amendments to the policy requirements are needed to ensure that the proposal is subject to Network Rail’s plans [**MM044**]; there are no objections from Network Rail to the WoS proposal. The IDP [PS/E23] identifies the necessary infrastructure needed for the development, which would be provided as it progresses. However, there is insufficient justification to require contributions to the restoration of the Stroudwater Canal, apart from improvements to the canal towpath, since it is not directly affected by the proposed development.
109. Stonehouse is one of the major employment locations in the district, with a strong demand for office and business units, and the ELS supports the employment element of the proposal [CD/C4; PS/E15]. The site adjoins a successful business park, lies within the LEP/SEP growth zone along the M5 corridor, and improvements to the A419 corridor are proposed to safeguard the economic potential of this area. It also has excellent accessibility to Stroud and the M5, enabling people to live and work locally, as well as commuting to work.
110. Bringing forward the employment element is an integral part of the overall WoS proposal, including bridging a watercourse and overcoming topographical constraints. The current developers confirm that employment uses would form an important part of the development, both within the proposed employment site and at the local centre. The provision of Class B1, B2 & B8 uses would reflect the conclusions of the ELS and market demands. It is important to ensure that the employment element is delivered in parallel with the proposed new housing to ensure a comprehensive mixed-use development; this can be addressed in the detailed phasing and master-planning of the development. The new local centre will be included in Policy CP12 of the SDLP [**MM099**]; retail impact would be considered when a specific proposal comes forward.
111. Despite all the local opposition to the proposed WoS development, I consider this is an appropriate, effective, positively prepared and fully justified proposal, which would be sustainable, viable, deliverable and soundly based, without having an unacceptably adverse impact on the character and role of Stonehouse, the local environment and landscape, or on existing and future traffic conditions. It is an important development which would make a significant contribution to the provision of housing and employment land in the district, fully in accordance with the strategy of the SDLP, is fully supported by the prospective developers, and has a realistic prospect of completion within the current plan period.
112. SDC has fully assessed reasonable alternatives to the WoS proposal during the plan-making process, at Key Issues, Alternative Strategies, Preferred Strategy and Submission stages [PS/B10]. Alternative growth scenarios and alternative sites were also considered later in the process when the housing requirement figure was increased. At this stage, the Alternative M5 Catchment option (including the WoS proposal) was assessed as being the best performing scenario

capable of delivering the higher housing growth levels [PS/E17], confirmed in the associated SA [PS/E18; REX/B15b]. Far from representing a fundamentally different strategy to that in the submitted SDLP, it is entirely in line with the proposed strategy, focused on a limited number of strategic mixed-used developments at the larger settlements in the district. Apart from the possibility of further development on the southern fringe of Gloucester, or in smaller settlements such as Kingswood or Berkeley, including a range of smaller sites, all of which would represent a fundamentally different strategy, no realistic alternatives to this proposal have been put forward by other parties; the scale of potential development at some of the smaller settlements in this sub-area, such as Eastington, would not be sufficient to replace the scale of development proposed at this major new urban extension.

113. As regards other settlements in this sub-area, Eastington, Kings/Leonard Stanley and Standish are relatively small settlements with limited strategic facilities, which are not suited to major/strategic growth. However, the strategy would allow local needs identified by the local communities, including local needs/affordable housing, community facilities, infrastructure and small businesses, to be addressed through neighbourhood plans, some of which are now emerging.
114. Consequently, with the recommended amendments [**MM038-046**], I conclude that the development strategy for the Stonehouse Cluster, including the proposed development at West of Stonehouse, is appropriate, effective, deliverable, sustainable, viable, positively prepared, fully justified and soundly based.

Cam & Dursley

115. The strategy for Cam & Dursley sees these settlements as a focus for the district’s strategic growth, providing new housing and employment land, boosting their economic and employment role, and directly linking to the “mini-vision” for this sub-area [PS2/B02e/B03h]. A key feature is a modest urban extension on a site at North-East Cam (450 dwellings; 11.4ha of employment land). Appropriate development to sustain the roles of the smaller settlements of Coaley and Uley will also be supported. The main issue is whether the development strategy for Cam & Dursley is appropriate, effective, deliverable, sustainable, viable, fully justified and soundly based, including the amount and type of housing and employment land and associated infrastructure issues.
116. Cam & Dursley are significant sustainable settlements, making up the district’s second largest population centre and in the first tier of the settlement hierarchy, with an important strategic retail, community and employment role and with good accessibility, including bus services and a railway station [PS/E21]. This area has suffered in the past through the loss of a major employer, which the allocation of more employment land will help to offset, offering more local job opportunities; the ELS [CD/C4] also identifies a local demand for small business units in this area. Along with existing commitments, the proposed housing allocation would provide 15% of the district’s new housing (including 135 affordable units), increasing its dwelling stock by 28%, consistent with its existing population and place in the settlement hierarchy. The provision of around 1,500 new jobs would not be inconsistent with the overall population and total number of houses planned for these settlements, and would enable the provision of housing, jobs and infrastructure in a sustainable, balanced and timely manner.
117. As for the deliverability of the North-East Cam site, developers endorse the proposal and are actively drawing up detailed plans [PS2/C13]; planning permission has previously been granted for Class B1 & B8 business uses on the proposed employment site. The site would provide excellent links to the local centre of Cam and is near the railway station. A critical element of infrastructure is a bridge across the river, which this proposal will bring forward as part of a larger, viable mixed-use development. The IDP [CD/C6; PS/E23] has identified the infrastructure requirements for this proposal, and does not identify any physical, financial or timing constraints that would restrict or delay its delivery.

118. Assessments of local traffic and junction capacity [PS/E22;PS2/B06] conclude that the proposed development can be accommodated on the existing highway network, although some junction improvements will be needed; neither HE nor HA have any objections to the proposal [REX/B05; PS2/C02]. A small part of the site, alongside the river, is subject to flood risk, but this can be accommodated in the layout of the development, and EA has no objections subject to some changes to the policy wording **[MM052-055]** [CD/D3; PS/E25; REX/B02]. Similarly, biodiversity can be enhanced along the river, as a landscaped corridor; keeping development below the 50m contour and providing structural landscaping would also help to minimise the impact of the development on the wider landscape [CD/C4a; CD/D14]. The development could commence after 2015/16 and would be completed within the current plan period. Minor amendments to the boundary of the development site, the detailed pattern and extent of land uses and site density could probably be addressed at the planning application stage; 450 dwellings is not intended to be a maximum figure. There is local support for the proposal, and based on all the evidence and discussions, this is soundly-based, appropriate and justified.
119. Some participants argue that Cam & Dursley should accommodate more development, including extending the proposed site and allocating other sites. Although there may be some scope to accommodate more development here in the future, the proposed allocation is consistent with the nature, scale and role of the existing settlements. SDC has tested higher housing growth levels at the North-East Cam site (of up to 750 dwellings), but this would require additional land, a proportionate increase in infrastructure and potentially a new primary school. Further development is not required to meet the identified housing requirement, but could be reconsidered when the Plan is next reviewed. I deal with other “omission” sites later in my report, but no other site promoted offers the benefits of bringing forward the proposed scale and mix of land uses, including both housing and employment, with such good links to the local centre.
120. In order to reflect consultations with prescribed bodies and points in the representations, amendments are needed to the Guiding Principles, supporting text and details of Policy SA3 **[MM047-055]**; these would make the Plan up-to-date, factually correct and ensure that important factors, such as flood risk, biodiversity and infrastructure are addressed. With these amendments, the development strategy for Cam & Dursley would be appropriate, effective, deliverable, sustainable, viable, fully justified and soundly based.

Gloucester Fringe

121. The strategy for the Gloucester Fringe focuses on an extension to existing development at Hunts Grove (with a further 500 dwellings) and an extension to the employment site at Quedgeley East (13ha) [PS2/B02f; PS2/B03e]. After considering the representations and discussions at the hearings, SDC agrees to increase the capacity of the Hunts Grove extension to 750 dwellings, with a small extension to the area. The main issue is whether the strategy for the Gloucester Fringe, including the Hunts Grove and Quedgeley East housing and employment allocations, is appropriate, effective, deliverable, sustainable, viable, positively prepared, fully justified and soundly based.
122. Hunts Grove is a major area of new development on the southern fringe of Gloucester city, allocated in the previous Local Plan as an urban extension to accommodate 1,750 new dwellings and 5.75ha of employment land, along with a local centre and other community and education facilities; the first phases of this new development are well underway [PS/B10]. Far from being an “irrational bolt-on”, the proposal would be a logical extension to an already planned mixed-use urban extension. It would also support the provision of the local centre and other social and community facilities, including improved public transport, and provide flexibility in the layout, access and phasing of the overall development; the further small extension would effectively complete the development of this large parcel of land. SDC has considered a range of alternative sites and options for the Gloucester Fringe, but this proposal would help to deliver over 25% of the district’s overall housing supply in an established and sustainable location, well

related to both Stroud and existing development on the southern fringe of Gloucester, making effective use of available land and planned infrastructure. GCC does not support further development on the southern fringe of Gloucester within Stroud district, but this proposal is intended to help meet the housing needs of Stroud, rather than Gloucester, in a sustainable location where new strategic growth is already established.

123. The developers of Hunts Grove fully support the proposed extension and are actively progressing the proposal through master-planning and legal agreements, but now consider the capacity of the site could be increased to 750 dwellings by a modest increase in density [CD/F3; PS2/C10]. The adjoining landowners also suggest incorporating a small area of pasture land in the south-west corner of the site to round-off the development and provide flexibility in the design and layout of the scheme; it would also improve viability, deliverability and critical mass of the development; a SOCG confirms that this extension is acceptable to both parties [PS2/D07]. These amendments have been subject to SA, and require the policy and accompanying text to be updated, in order for it to be effective and sound **[MM056/059/ 061-062/064-065]**.
124. The Viability Study [CD/F19] confirms that the proposal is viable and deliverable within the plan period, although with the increased overall scale of development at Hunts Grove (now 2,500 dwellings), the later phases might not be completed until the latter part of the current plan period. The completion of the overall development would require a significant uplift in current building rates, but with more outlets as new housing progresses, the current developers confirm that there is sufficient time for the development to be completed within the current plan period, with flexibility in delivery. A package of transport works is already agreed for the existing Hunts Grove development [CD/F3; PS2/C10], and a further highways assessment [PS/E22; PS2/B06] confirms that no further mitigation to existing junctions with the M5 motorway would be required for the proposed extension. Further transport assessment, including detailed access and junction design, will be carried out as the development proceeds, and there are no outstanding objections from HE or HA [REX/B05; PS2/C02].
125. The IDP [CD/C6; PS/E23] outlines the infrastructure required, and although the proposed extension might require a reassessment of the scale and nature of community, education and health facilities and further contributions to highway works, it did not identify any constraints that might restrict or delay the increased level of growth at Hunts Grove. The case for a new railway station is highlighted in the LTP. A small part of the proposed extension lies within the floodplain, but SDC has carried out flood risk assessments [CD/D3; PS/E25] which conclude that the sustainability benefits of growth at this location outweigh the limited flood risk, particularly since the affected areas could be used for open space or flood storage; EA has no outstanding objections to the proposed extension, subject to detailed changes to the text of Policy SA4 [REX/B02]. However, amendments to the policy and accompanying text are needed to ensure that flood risk and related issues, including transportation, infrastructure, access and master-planning, are properly addressed **[MM057-061/063/066-068]**.
126. The additional employment land proposed at Quedgeley East is strongly supported by the ELS [CD/C4; PS/E15-E16] and by the developer, who is actively promoting the scheme. It is a logical extension to one of the main employment locations in the district, close to the M5 (J12), main A38 and other employment and residential areas. Further work on junction capacity [PS/E22; PS2/B06] confirms that no further mitigation or junction improvements are needed to accommodate the development, and further transport assessment will be undertaken as the development progresses; HE has no objections to the proposal [REX/B05; PS2/C02]. Issues regarding flood risk have been fully considered and addressed [PS/E25], and EA no longer has any objections to the proposal [REX/B02].
127. The Gloucestershire Waste Core Strategy (Policy WCS6) allocates nearby land at Javelin Park for a strategic waste recovery facility. This location is identified in the SDLP, whilst land to the north is committed for employment use and

safeguarded under Policy EI1 of the SDLP; SDC proposes to amend Policy EI1 to clarify the situation [**MM105**]. The Energy from Waste facility now has planning permission, and there is no conflict between this scheme and the SDLP proposal.

128. Some parties consider more development should be allocated to the Gloucester Fringe. SDC has considered various strategic growth options and sites in the Gloucester fringe on several occasions during the course of preparing the SDLP, including initial assessment as part of the former SWRSS Review and later SA and other work [CD/E3; REX/B15b]. The proposed extension to Hunts Grove represents the most logical and sustainable option, and no other sites have the benefits that this extension would provide in making the best use of existing and proposed infrastructure and facilities in a sustainable and established location for strategic growth. I deal with other “omission” sites later in my report (including land at Hardwicke and Whaddon), but in general terms, most of the other options would involve commencing large-scale housing developments in new locations, rather than complementing, completing or supporting existing or planned developments.
129. In the wider context, further development on the southern edge of Gloucester would tend to shift the focus of strategic growth away from the main towns within Stroud district to a location which may be better placed to meet the needs of the adjoining housing market area, with consequent objections from adjoining local authorities. At present, further development in this location is not needed to meet the SDLP’s housing requirement figure; if further land is needed to meet the housing needs of Stroud or the adjoining districts, then strategic options for further development in the Gloucester fringe would be more appropriately assessed as part of the commitment to review the SDLP under Policy CP2.
130. Consequently, with the necessary amendments [**MM056-068**], the development strategy for the Gloucester Fringe, including the Hunts Grove extension and Quedgeley East employment allocation, is appropriate, effective, deliverable, sustainable, viable, fully justified and soundly based.

Berkeley Cluster

131. The strategy for the Berkeley cluster focuses on the regeneration of the Sharpness/Newtown area, with 300 new dwellings and 7ha of employment land at Sharpness Docks [PS2/B02g]. This allocation reflects current proposals of the Canal & River Trust (C&RT) for a mixed-use scheme to provide new housing, employment, leisure and other uses, along with the redevelopment of brownfield sites and a comprehensive regeneration of Sharpness Docks. The SDLP also proposes some 10ha of new employment land adjoining Severn Distribution Park and also now reflects current proposals for the Gloucestershire Science & Technology Park at the former Berkeley Nuclear Power Station site. The main issue is whether the strategy for the Berkeley Cluster, including Sharpness Docks, is appropriate, effective, deliverable, viable, fully justified and soundly based.
132. Sharpness/Newtown is not a first or second tier settlement, with relatively poor accessibility to the range of strategic facilities normally associated with a strategic development of this nature. However, the current proposal would assist in achieving sustainability objectives, with the benefits to the overall community and local economy of the comprehensive regeneration of Sharpness Docks. The scheme is being actively promoted by C&RT to take advantage of the opportunities that exist here, particularly its heritage, landscape and ecological assets, riverside/ canalside setting, leisure and tourism opportunities, as well as intensifying existing employment and dock-related uses. Overall, the proposal would achieve a sustainable development, bringing social and economic benefits, meeting the need for jobs and homes, with improved public transport, enhanced accessibility and facilities as a direct result of the development; it would also make effective use of under-used assets to create wealth, conserve and enhance conservation and the historic environment, and improve community well-being, in line with the NPPF. In essence, it is a special case to provide a bespoke solution to a unique opportunity to regenerate Sharpness Docks, which the Local Plan should reflect and support.

133. The proposal is supported by the local community, C&RT, the dock company and other stakeholders. The IDP [PS/E23] does not identify any infrastructure constraints to the development and confirms that it would help to retain and support existing services in the Sharpness/Newtown area. The Junction Capacity Study [PS/E22; PS2/B06] outlines several road, bridge and junction improvements that will be required, some of which have attracted Government/LEP funding for improvements to transport infrastructure. The proposal would improve internal and external access arrangements, with contributions required to improve bus services, and there are no objections from HE or HA [REX/B05; PS2/C02].
134. The Flood Risk Sequential Test update [PS/E25] demonstrates that, whilst parts of the site fall within Flood Zones 2 & 3, most of the area lies within Flood Zone 1, and C&RT confirms that the design, layout and uses within the proposed scheme could mitigate and accommodate flood risk, with safe access; EA has no objections to the project, subject to amendments to Policies SA5/SA5a and the supporting text **[MM071/073/ 075-079]** [REX/B02]. The Viability Study [CD/F19] indicates that the proposal is viable and deliverable, a view confirmed by C&RT who is actively progressing the project, anticipating development taking place at a modest rate between 2018-2029.
135. The extension to Severn Distribution Park would bring sustainability and employment benefits to the area, with the opportunity to expand industrial and logistics businesses; the ELS [CD/C4; PS/E15] supports the proposal, and the site is within the LEP/SEP Growth Zone. Evidence demonstrates that, although 60% of the site lies within Flood Zones 2 & 3, there is sufficient land within Flood Zone 1 to accommodate the proposed development, subject to appropriate mitigation, layout of buildings and safe access [CD/D3; PS/B2; PS/E24-E25]. Improvements to roads and junctions, both locally and along the route to the A38/M5, will ensure that access to the area is improved. The site is being actively promoted by landowners, with a planning application for employment uses. The proposal for a new science park at the former nuclear power station is addressed later in this report, under Policy EI2a, but needs to be referred to in this part of the Plan to ensure that it is up-to-date, effective and sound **[MM070-072/108-109]**.
136. Since these sites are close to the Severn Estuary SAC/SPA/RAMSAR site, the impact of the proposed developments on the ecological importance of the designated area is a relevant issue. However, the updated HRA [PS/E20; PS3/02] sets out recommendations for Sharpness Docks (Policy SA5), including the need for visitor and bird surveys, a management plan and other mitigation measures. Various surveys are underway, and NE & EA are now satisfied that ecological, habitat and water resources/quality concerns have been adequately addressed [REX/B02; REX/B04], subject to the recommended amendments **[MM076-079]**.
137. Some developers consider there should be more development in the Berkeley cluster sub-area, particularly at Berkeley itself, a market town and a second-tier settlement which could be expected to accommodate more growth. SDC confirms that Berkeley featured in several alternative strategies when the Plan was being prepared. Within the current plan period, with commitments and completions, Berkeley has experienced 9% growth, slightly less than other 2nd tier settlements. The SHLAA [CD/B4] assessed several potential sites within and outside Berkeley, but the peripheral greenfield sites were either not promoted through the local plan process or had environmental constraints (including impact on the setting of Berkeley Castle, with objections from English Heritage). I deal with specific “omission” sites later in my report. In the meantime, the SDLP strategy would allow appropriate development to boost Berkeley’s role as a Local Service Centre.
138. On this basis, with the proposed amendments **[MM069-079]**, the strategy for the Berkeley cluster, including proposals for Sharpness/Newtown, Sharpness Docks and the Severn Distribution Park, is appropriate, effective, deliverable, viable, fully justified and soundly based.

Severn Vale, Wotton Cluster and Cotswold Clusters

139. The Severn Vale, Wotton and Cotswold Clusters lie within the rural area of the district, focused on the Severn valley and Cotswolds AONB. The general principle is not to have any strategic development here, but to enable appropriate development that supports and sustains the roles of the key settlements [PS2/B02h]. The main issue is whether the strategy for this area is fully justified, appropriate, effective, deliverable, sustainable, viable and soundly based.
140. The strategy for these rural areas is an integral part of the overall development strategy which seeks to prioritise growth at the more sustainable locations, in line with the settlement hierarchy, focusing most new development at several strategic locations where housing, jobs and infrastructure can be delivered together. The corollary is to restrict development elsewhere, whilst enabling these more rural settlements to meet their future development needs. Some of these rural settlements have already accommodated significant new development in the recent past, but it is now necessary to re-focus future development towards the more sustainable locations. Since there is sufficient evidence to justify this approach, including the delivery and viability of the main strategic allocations, this is an appropriate, soundly-based and effective element of the development strategy, which will help to ensure a sustainable pattern of development.
141. The term “*appropriate development*” could be considered too vague, but when read with the specific policies and Plan as a whole (including Policies CP3, HC1 & HC4), this refers to a range of land uses (eg. housing, employment, community and retail) which would support the role of the key settlements in these areas and help to meet local needs. Rather than preventing development, it would enable allocations in subsequent neighbourhood plans, rural “exception” sites, infill sites and development outside settlement limits meeting the criteria in Policy CP15. To clarify the position and make the Plan effective, amendments are needed to the criteria in the Guiding Principles, to address identified constraints and recommendations in the IDP [**MM080/082-083**], for consistency and soundness.
142. Turning to the specific areas, much of the Severn Vale is subject to flood risk, particularly along the Severn estuary, and the restriction on new development is fully in line with national policy (NPPF; ¶ 99-101; 106). Most of the settlements are relatively isolated and lie some way from the main transport corridors. The largest settlement, Frampton-on-Severn (2nd tier), only has a limited strategic role in providing services and facilities, essentially for the local area and nearby villages. It has poor transport links and environmental constraints, including its heritage assets and the nearby floodplain and Severn Estuary SPA/SAC, which limit its capacity to accommodate growth; but the strategy does allow limited development to boost its role as a Local Service Centre. Other settlements, like Whitminster, were considered as possible growth locations, but were ruled out, since other nearby settlements, such as Cam, Dursley and Stonehouse, are more sustainable and viable options [CD/F15; CD/D7]. In any event, the strategy supports appropriate development which sustains Whitminster as a 3rd tier settlement with limited facilities. The strategy also supports the restoration of canals in this area, which provide the gateway to the Cotswold Canals. As such, the strategy provides an appropriate balance between protecting and conserving the local character of this area, whilst accommodating the local need for development in a sustainable manner.
143. Similarly, environmental constraints affect the Wotton Cluster, including the Cotswolds AONB, which covers much of this rural area. Wotton-under-Edge is acknowledged as the largest (2nd-tier) settlement in this cluster, with an important retail and community role as the main Local Service Centre for the area, as well as a significant employment role. Potential growth was considered here during the plan-making process, but was ruled out in favour of concentrating development at the more strategic and sustainable locations, such as nearby Cam & Dursley [CD/E2; CD/F6; CD/F8; CD/F16]. However, limited development could be accommodated both here and at 3rd tier settlements of Kingswood and North Nibley, to support and sustain their roles. Neighbourhood plans are also being

considered for some of these settlements, which may provide further opportunities for development to meet local needs.

144. The Cotswold cluster of settlements is entirely within the Cotswolds AONB, which is a significant constraint to strategic growth. Painswick is the largest (3rd-tier) settlement in this area, and while it has an important retail and community role, with good accessibility, it occupies one of the more prominent and conspicuous locations within the AONB; with conservation and heritage assets, it has limited opportunities to accommodate growth. Potential growth here, and at Bisley, was considered during the plan-making process, but ruled out in favour of a more concentrated development strategy focused on more sustainable and strategic settlements outside the AONB, including Stroud and Stonehouse [CD/E2; CD/F6; CD/F8; CD/F16]. Nevertheless, limited development could be accommodated at these settlements (along with Oakridge Lynch) to meet the future local needs of these communities.
145. Consequently, with the proposed amendments **[MM080-083]**, the development strategy for these rural settlements, allowing some limited development to support and sustain these local centres and meet local needs, is appropriate, effective, deliverable, sustainable, viable, fully justified and soundly based.

MATTER 4 – HOMES & COMMUNITIES

Key issue – Does the Plan provide an appropriate, effective and soundly based framework for achieving healthy and inclusive communities, providing a mix of dwellings, including affordable housing and meeting the need for gypsy and traveller accommodation, and delivering residential development within urban areas, defined settlements and on strategic development sites, which is fully justified and consistent with national policy?

Lifetime Communities

146. Core Policy CP7 seeks to ensure that new housing development contributes to the provision of sustainable and inclusive communities. The main issues are how the policy will actually assist in achieving this objective and whether the requirements are justified, consistent with the latest national policy, or whether they are too inflexible, unrealistic and onerous.
147. The policy aims to ensure that demographic and social factors inform major housing schemes, helping to meet the housing needs of the local community, taking account of the mix of housing based on demographic trends and the needs of different groups in the community. This approach is in line with NPPF (¶ 50; 69), which seeks to deliver a wide choice of homes in order to create sustainable, inclusive and mixed communities. The policy is supported by evidence, including work on the assessment of housing need, SHMAs & SHLAAs, and further work has been undertaken to assess the needs of the district’s ageing population [PS/E09c].
148. The policy does not refer to specific housing standards and is flexible in its approach, taking account of deliverability and viability; the Viability Studies [CD/F19; PS/B6] have taken account of these policy requirements. The approach to addressing local needs, including Parish Needs Surveys, is clarified in Policy HC4 and, for clarity, SDC suggests including definitions of “lifetime communities” and “lifetime accommodation” in the glossary [PS2/B03i]. On this basis, Policy CP7 is justified, consistent with national policy, and would provide an effective and soundly based framework to ensure that new housing development contributes to the provision of sustainable and inclusive communities and reflects the housing needs of the local community, without being unduly onerous or inflexible.
149. Core Policy CP8 sets out the design criteria for new housing developments, bringing together a range of economic, social and environmental factors referred to in the strategic objectives and in other policies of the Plan. It reflects some of the core principles and policies in the NPPF (¶ 17; 56-66; 97), and will be used positively to guide the design and layout of new housing, without being unduly prescriptive or onerous. In terms of housing needs, including types, tenures and

sizes of new housing, it is supported by the various SHMAs which have now been consolidated [PS2/D17]. The policy does not introduce irrelevant factors in terms of design, and its requirements have been considered in the viability studies. However, an amendment to the policy is needed to introduce a further element of flexibility relating to biodiversity **[MM085]** and ensure that the policy is effective and consistent with the CIL regulations. With this amendment, the policy is appropriate, justified, consistent with national policy and would provide an effective framework for considering the housing needs and design elements of new housing schemes.

Affordable housing

150. Core Policy CP9 sets out the approach to affordable housing, including thresholds and targets for provision. SDC initially proposed to amend the size of sites where affordable housing would be sought, in response to an amendment to national policy [PS2/B02i], but since this has now been withdrawn, the policy reverts to its previous thresholds in the submitted Plan [PS3/08]. The overall need for affordable housing (446 units/ year) has been referred to earlier in this report, and this figure needs to be included in Policy CP9 and the accompanying text **[MM086-087]**. The main issue is whether the approach to providing affordable housing is soundly based, appropriate for Stroud, justified with evidence, effective, deliverable, viable and consistent with national policy.
151. The final recommended version of Policy CP9 seeks a 30% proportion of affordable housing on all housing sites of at least 4 dwellings (0.16ha), where it is viable; for sites of less than 4 dwellings, it seeks a financial contribution towards the provision of affordable housing of at least 20% of total development value. This approach is justified by the evidence and overall level of need for affordable housing identified in the SHMA and updates [PS/B18; REX/B17; PS2/D17]; it also recognises that small sites constitute an important component of housing delivery in Stroud. For smaller sites, the 20% contribution towards affordable housing provision seems reasonable and proportionate, given that building costs are likely to be higher on such sites. The approach of the SHMAs addresses the need for affordable housing in a logical, transparent and comprehensive manner, in line with the PPG [ID-2a].
152. The Viability Studies [CD/F19; PS/B6] tested affordable housing scenarios for a range of housing sites, and confirm that an overall figure of 30% is generally viable, reasonable and deliverable, although it may not be achievable on a few brownfield sites with abnormal costs. This work remains robust, given that both building costs and development/land values have risen since the studies were undertaken, but will be soon updated as part of the CIL process. SDC has reviewed the situation following the 2015 Government budget, which may affect affordable housing rental values and tenure mix, but this does not affect the overall need for affordable housing. The viability studies remain broadly representative of the viability of development in Stroud and Policy CP9 confirms that provision will be subject to viability and site-specific circumstances, on a case-by-case basis, with flexibility in tenure mix, in line with the NPPF (¶ 173). I realise that the proposed thresholds may have implications for the viability and delivery of smaller housing sites, but developers will be able to negotiate lower levels of affordable housing provision or contributions on the grounds of viability.
153. The Housing Strategy [REX/D07] confirms that the provision of affordable housing is one of SDC’s corporate priorities. SDC accepts that the 30% target provision would not deliver all the affordable housing needed, but there are a range of other initiatives that would also make a significant contribution; these include SDC’s own social housing programme (150 units), mortgage scheme, small sites review and rural exception sites, along with Housing Associations, Registered Providers and other specific schemes [REX/B17; REX/D07]; local housing needs surveys will be undertaken regularly to ensure that local needs are identified and met. Moreover, the role and use of the private rented sector cannot be ignored, particularly where interventions are made to provide affordable accommodation from this source. SDC has addressed and updated the required mix of housing,

including tenure, size and type of affordable housing, in the SHMA work [PS2/D17], seeking to reflect need, including a 50:50 mix of affordable rent/intermediate tenure, with flexibility to respond to specific schemes. Further guidance will be provided in SDC’s forthcoming Affordable Housing SPD.

154. Consequently, with the latest amendments to Core Policy CP9 and the supporting text **[MM086-087]**, the proposed approach provides an effective and soundly based framework to ensure the provision of affordable housing reflecting the identified need, which is appropriate, justified with robust and reliable evidence, viable, deliverable and consistent with national policy.

Gypsies & Travellers

155. Core Policy CP10 sets out the approach to providing sites for gypsies, travellers and travelling showpeople, including a locally set target of 31 additional pitches for gypsies and travellers and 8 additional plots for travelling showpeople. It confirms that a 5-year supply of specific, deliverable sites will be maintained throughout the plan period, with a sequential approach to provision and criteria for additional sites if that need cannot be met at existing suitable sites. It is supported by a recent 2013 County-wide Gypsy & Traveller Accommodation Assessment (GTAA) [CD/B11], which identifies the need for gypsy and traveller (G&T) accommodation for each local authority over each 5-year period.
156. SDC has provided further evidence on G&T provision during the course of the examination [PS2/B02i-B03i; PS2/B10]. In Stroud, planning permission has already been granted for 20 G&T pitches, which would meet projected needs until at least 2023 and more than meet current 5-year requirements. The policy also indicates broad locations for future provision as part of the sequential approach, which will guide the provision of pitches in the longer term or when the Plan is reviewed; a recent call for sites has identified some potential extension sites at existing G&T sites. With permission already granted for 8 pitches for travelling showpeople, this would meet the projected needs throughout the period of the Plan. Permission has also been granted for 6 transit pitches, even though the GTAA does not identify a need for any further provision.
157. The GTAA assessed the cross-boundary implications of G&T provision, and confirms that there are no specific unmet G&T needs from adjoining authorities that have to be met within Stroud district. SDC has engaged proactively with the gypsy community on its approach to meeting G&T needs, and has a good track record of permitting new sites. The recent review of national policy for traveller sites does not require any amendments to the proposed approach. On this basis, Policy CP10 provides an appropriate and effective framework for making future provision for G&T accommodation needs, which is justified with evidence, consistent with national policy and soundly based.

Delivery policies

158. Policies HC1-HC8 provide more detail about the interpretation and application of the development strategy and core policies relating to homes and communities.
159. Policy HC1 sets out criteria for meeting small-scale housing need within the defined development limits of identified settlements, without precluding new development on the edge of such settlements, provided that the relevant criteria are met; the critical factors are the scale, location and design of the new development and its relationship to the form and character of the settlement. Other policies deal with development outside settlement boundaries.
160. The issue of settlement boundaries can be rather contentious, not only the principle of defining them, but also the detailed boundaries; this is addressed in more detail under Core Policy CP15. The approach of Policy HC1 stems from the previous local plan, and is a key element of the Plan’s strategy to direct most new development to sustainable locations at the higher-tier settlements; this helps to prevent uncontrolled expansion and coalescence of settlements and safeguard the countryside from encroachment. In the past, a consistent supply of windfall sites has come forward from within existing settlements, which this policy would allow

to continue, including larger sites. However, the reference to small-scale development needs to be deleted in order for the policy to provide an appropriate, effective and soundly based framework to consider suitable proposals for residential development within the existing settlements **[MM088]**.

161. Policy HC2 provides an appropriate, effective and soundly based framework for considering proposals to use the upper floors of shops and offices in town centres for residential purposes. This approach complies with NPPF (¶ 23), and is not inconsistent with recent changes to permitted development rights relating to changes of use of existing premises.
162. Policy HC3 supports self-build housing at the strategic sites, seeking at least 2% of such dwellings, amounting to a total of about 90 units. This approach accords with NPPF (¶ 50) & PPG [ID:2a-021] and other recent Government statements and initiatives. It is supported by evidence, including a specific survey of local residents and businesses, which demonstrates a demand and strong interest for self-build housing [PS2/B02i]. Such provision would not be discounted from affordable housing requirements, since it does not normally meet such needs. SDC confirms that the policy will be applied with some flexibility, subject to demand being identified and recognising site-specific and viability factors. With the recommended amendments **[MM089-090]**, it provides a clear, effective and appropriate mechanism for supporting self-build schemes, which is justified with evidence, consistent with national policy and soundly based.
163. Policy HC4 sets out the approach to meeting local housing need through rural exception sites, both at the higher and lower tier settlements. It enables these needs to be met on sites as an exception to the usual policies of development constraint, with sufficient evidence of local need; it also allows some market housing if this is needed to cross-subsidise the affordable housing element, in line with the NPPF (¶ 54). However, some clarification is needed about the way the housing needs survey will be produced **[MM091]**, in order to ensure that the policy is effective, consistent with national policy and sound.
164. Policies HC5-HC8 provide an appropriate, effective and justified framework for considering proposals for replacing and sub-dividing existing dwellings, annexes for dependents or carers, and extensions to existing dwellings. These policies are similar to those in the previous local plan, and provide sufficient flexibility without being unduly restrictive, setting out the criteria and factors that will be considered. They reflect key elements in the NPPF (¶ 55, 58-59; 60), and no changes are needed in the interests of soundness.
165. Consequently, with the recommended amendments **[MM084-091]**, these policies provide an appropriate, effective and soundly based framework for achieving healthy and inclusive communities, providing a mix of dwellings, including affordable housing and gypsy and traveller accommodation, and delivering residential development within urban areas, defined settlements and on strategic development sites, which is fully justified and consistent with national policy.

MATTER 5 – ECONOMY & INFRASTRUCTURE

Key issue – Does the Plan set out a clear economic strategy which positively and proactively supports sustainable economic growth by delivering a range and mix of employment uses and sites in the most appropriate locations, supported by and integrated with housing and other community infrastructure, as well as protecting and bolstering the role of the town centres and other district/local centres, promoting sustainable transportation and managing the demand for travel, which is justified, effective, soundly based, appropriate for Stroud district and consistent with national policy?

New Employment Development

166. Core Policy CP11 confirms that new employment development will be provided through a range of sites and premises across the district, including allocating strategic employment sites, encouraging mixed-use developments and supporting the expansion of existing businesses and rural diversification. It also aims to

safeguard existing employment sites and sets out the factors for permitting industrial/business developments, including expansion and intensification of existing businesses. The main issue is whether this policy provides an appropriate, effective and soundly based framework for delivering new employment development, including safeguarding existing employment sites, which is consistent with national policy.

167. This policy is central to promoting economic growth in Stroud, is founded on specific evidence on employment land supply in the ELS and its recent review [CD/C2; CD/C4; PS/B19; PS/E15-E16], and the future needs of business and employment; it also takes account of the LEP’s Strategic Economic Plan and the relationship with the wider economic strategy for Gloucestershire [PS/D6ab]. The approach is consistent with the core planning principles and economic policies in the NPPF (¶ 18-22), and would help to support sustainable economic growth and the expansion of existing businesses. It applies to all forms of job growth, not only in traditional employment uses, but also in tourism, retailing, health-care, education and other uses. The possibility of adding a specific clause relating to ancillary uses would tend to weaken the thrust of the policy to secure job opportunities and reduce clarity by allowing the inclusion of non-employment uses. The specific criteria relating to alternative uses on existing employment sites enable flexibility to consider mixed-uses and other developments if the criteria are met. Similarly, the criteria for permitting new or expanded employment uses set a sound policy framework to consider such proposals.
168. In order to ensure that the policy is comprehensive and effective, a clause needs to be added to cover accessibility and sustainable transport infrastructure; a further amendment is also needed to confirm that the requirement to retain job opportunities on sites covered by this policy would be subject to viability and site-specific circumstances. With these recommended additions **[MM097-098]**, the policy provides a sound and effective framework to deliver new employment development and safeguard existing employment sites, which is justified and consistent with national policy.
169. Policy EI1 aims to safeguard key employment sites in the district. It directly reflects the recommendations of the ELS [CD/C4; PS/E15] to retain and protect key existing employment (Class B) sites in the district, after reviewing their suitability for continued employment use, in line with NPPF (¶ 21). SDC confirms that such sites could include some ancillary employment uses associated with the primary employment use.
170. As for the specific employment sites safeguarded by the policy, some parties are concerned about intensification and incremental expansion of the Aston Down employment site (EK21), suggesting the need for a site-specific policy. Aston Down is a former military airfield, with a range of buildings and structures mainly dating from the wartime, now used for a variety of employment and storage uses. The ELS [CD/C4] recognises that the site makes a significant contribution to the economy and employment land supply of the district, but it lies within the AONB, is remote from any major settlement, and has sustainability, accessibility and public transport shortcomings. The site was the subject of a planning appeal in 2009, which established a detailed planning regime for the site, strictly controlling the uses of land and existing buildings. Any future proposals for development, intensification or changes of use at this site would need to have regard to this planning decision, as well as the significant policy constraints which apply in this area, including its location in the AONB and accessibility issues. In these circumstances, it is appropriate to identify this as a key employment site in the district, but there is no need for a site-specific policy in this Plan.
171. In order to reflect the specific proposal for the new Berkeley Centre at the former Berkeley Power Station, a new policy (Policy EI2a) and accompanying text is needed, along with a site-specific allocation on the Policies Map **[MM104/108-109]**. This proposal now has planning permission and these amendments will reflect the current position and provide a policy framework for the Gloucestershire Science & Technology Park, a major new proposal, which has the full support of

the LEP and the developer [PS2/D04]. Additional wording in the text accompanying Policy EI1 is also needed to confirm the allocation of the Javelin Park strategic waste recovery site (EK14), included in the Gloucestershire Waste Core Strategy; the northern part of this site is not subject to the waste recovery allocation, and so could be used for a wider range of business purposes **[MM105]**.

172. Policy EI2 aims to regenerate specific existing employment sites for mixed-use development, including employment-generating and other uses. It would facilitate a broader range of economic development, where a more intensive mixed-use redevelopment could benefit the local community in meeting local needs, rather than retaining the sites solely in employment use, reflecting the recommendations of the ELS. Many of these sites are former mills or under-used industrial areas, where regeneration by providing mixed-uses would enable more effective use of these brownfield sites. This approach is consistent with the NPPF (¶ 21), which requires flexibility to accommodate development needs, as well as identifying priority areas for economic regeneration.
173. However, by requiring all proposals for mixed-use development to retain an equivalent amount of jobs on site, the policy could be unduly prescriptive. Evidence provided with emerging proposals for some sites (such as Wimberley Mills) suggests that there could be viability issues about including some employment uses within these schemes. In response, SDC confirms that the retention of job opportunities would be subject to viability and site-specific circumstances; the recommended amendment **[MM107]** would ensure that the policy is effective and sound.
174. Policy EI3 aims to protect smaller employment sites, acknowledging their contribution to local employment and the local economy, reflecting evidence in the ELS. It also recognises that most employment sites in the district are less than 2ha in size, and reflects the apparent demand for small freehold plots for business use. The requirement to demonstrate “*exceptional circumstances*” to allow alternative uses reflects the need for a strong policy to protect such land for existing and future employment purposes, while providing some flexibility to allow alternative uses, in line with national policy.
175. Policies EI4 & EI5 set out the approach to development on existing employment sites in the countryside, along with farm enterprises and diversification; this helps to support thriving rural communities and economic growth in rural areas, in line with the NPPF (¶ 28). They recognise the need to enable job creation in rural areas, including the growing small-scale advanced manufacturing and high-tech businesses identified in the ELS. The policies provide a positive and effective framework that not only recognises the intrinsic character of the countryside, but also supports rural communities and thriving smaller-scale businesses, having regard to location, accessibility and sustainability, without being unduly prescriptive or restrictive. However, Policy EI4 needs to be brought into line with the supporting text **[MM110]**, in order to be effective and soundly based.

Town Centres & Retailing

176. Core Policy CP12 seeks to protect and enhance the role of town centres in providing jobs and contributing to the local economy. It defines the main retail hierarchy of town, district and local centres and neighbourhood shops, with Stroud as the principal town centre, consistent with the settlement hierarchy in Policy CP3. It also sets out the approach to new local centres at the urban extension sites (including West of Stonehouse **[MM099]**), and directs retail and other uses to the centres in the hierarchy. This approach, including the sequential approach to locating retail and major town centre uses and the range of retail uses at and outside existing centres, is consistent with the NPPF (¶ 23-27) and is supported by evidence in the Retail & Town Centres Studies [CD/C1; CD/C7]. With the proposed amendment, the policy provides an effective and soundly based framework for maintaining and enhancing the roles, functions, vitality and viability of the main town and local centres, which is justified and consistent with national policy.

177. The approach to protecting existing village shops, public houses and community facilities set out in Policy EI6 is consistent with the NPPF (¶ 28) and other legislation relating to permitted development rights and Assets of Community Value. It helps to support thriving local communities and is soundly based. The approach to non-retail uses in primary and secondary shopping frontages set out in Policies EI7-EI8 is also appropriate, effective, soundly based and consistent with national policy. It is supported by the Retail & Town Centres Studies, with the designated frontages being shown on the Policies Map. The floorspace thresholds for retail impact assessments set out in Policy EI9 (500/ 1000 sq. m) are appropriate for Stroud district, given the relatively small scale of most of the district’s town and local centres and their potential vulnerability to the impact of larger-scale retail proposals; West of Stonehouse is to be added to the list of centres in this policy **[MM111]**. This approach is supported by the Retail & Town Centres Studies, is consistent with the NPPF (¶ 26) and is soundly based.
178. Policy EI10 sets out the approach to providing new tourism opportunities in the district. Tourism is important to the economy of Stroud, particularly in the attractive rural areas, and the policy positively supports sustainable rural tourism and leisure developments which benefit businesses in the rural areas. This approach is consistent with the NPPF (¶ 28) and is soundly based. Policy EI11 promotes sport, leisure and recreation, with specific criteria for such new developments. It is supported by evidence on outdoor play space and open space [CD/D1; CD/D13] and provides an appropriate, effective, justified and soundly based framework for considering proposals for new sport, leisure and recreation facilities. However, the policy needs to recognise any overriding environmental or other material planning constraints and, with this amendment **[MM112]**, it is consistent with the NPPF (¶ 70-73) and sound.

Travel & Transport

179. Policy CP13 sets out the criteria for new developments in terms of travel and transport, addressing demand management and sustainable travel measures, as well as the strategic objectives. In formulating this policy, SDC has worked closely with HE & HA to produce robust evidence to support the travel and transport elements of this policy. SDC accepts that the initial transport evidence submitted with the original plan was inadequate, but has carried out further work. The policy is supported not only by the Sustainability Appraisal work and Carbon Footprint Study [CD/D7], but also by more recent Transport Impact Assessment [PS/B26], Sustainable Transport and Capacity Assessments and Junction Testing [PS2/B06-B07; PS/E22], Viability Studies [CD/F19; PS/B6] and an updated Infrastructure Delivery Plan [PS/E23], which outlines infrastructure requirements for new developments, including timing and funding. Issues concerning the funding of key highway schemes (such as the A419 and motorway junction improvements) seem to be progressing satisfactorily with a realistic prospect of implementation at the appropriate time [PS2/D10]. Further transport assessments will be carried out as more detailed schemes emerge for the larger strategic development sites.
180. Amendments to the accompanying text are needed to fully address the concerns of HE & HA, including reference to the latest Local Transport Plan (LTP) [REX/B05] **[MM100/102-103]**; HE has commended SDC on the work undertaken, HA is satisfied with this work, and there are no outstanding issues. The approach is consistent with the NPPF (¶ 29-41) and SDC confirms that the policy and additional work undertaken fully meets the guidance in the PPG [ID:54], including baseline information, issues covered, approach and methodology [PS2/D01]. Other changes to the accompanying text have also been made to address air safety and airfield/ aerodrome operational issues **[MM101]**. With these amendments, Policy CP13 provides an appropriate, effective and soundly based framework for addressing demand management and sustainable travel measures, which is justified, consistent with the views of HE & HA, and in line with national policy.
181. Policy EI12 aims to promote transport choice and accessibility by delivering transport infrastructure, enhancing accessibility and applying parking standards. However, amendments are needed to clarify the approach to enhancing

accessibility and reflect a recent ministerial statement about parking standards, whilst retaining references to long-standing County-wide parking standards **[MM113-114]**. This policy is also supported by the additional transport evidence now available in terms of assessing the quality and capacity of transport infrastructure. With the recommended amendments, the policy is appropriate, effective, justified, soundly based and consistent with the latest national policy.

182. Policies EI13-EI16 aim to protect and extend cycle routes, protect and provide railway stations, protect freight facilities at Sharpness Docks and provide public transport facilities. In preparing these policies, SDC has worked with local communities and other stakeholders, and has secured funding for improved cycle networks, including as part of canal restoration. The requirements of these policies have been considered in the viability studies, and the protection and regeneration of freight facilities at Sharpness Docks is supported by the ELS and LTP. Effective rail networks are important to the local economy, including freight, with improved access, stations and public transport facilities being a key objective in the LTP. SDC has provided further evidence on the justification for these policies [PS2/B02j], and their approach is appropriate, effective, soundly based and consistent with the NPPF (¶ 29-41) and LTP.
183. With these amendments **[MM092-114]**, the policies for the economy and infrastructure set out a clear economic strategy which positively and proactively supports sustainable economic growth by delivering a range and mix of employment uses and sites in the most appropriate locations, supported by and integrated with housing and other community infrastructure. They also protect and bolster the role of the town centres and other district/local centres, promote sustainable transportation and manage the demand for travel. On this basis, the policies are justified, effective, soundly based, appropriate for Stroud district and consistent with national policy.

MATTER 6 – ENVIRONMENT & SURROUNDINGS

Key issue: Does the Plan provide an appropriate, effective and soundly based framework for protecting, maintaining and enhancing the high quality environment within Stroud district, including providing high quality sustainable development and maintaining a quality living and working countryside, adapting to climate change, maintaining quality of life, protecting the built and natural environment, and protecting existing and providing new open spaces, which is fully justified and consistent with national policy?

High quality sustainable development

184. Core Policy CP14 seeks to achieve high quality sustainable development, with a set of criteria indicating where development will be supported. The main issues are whether the development principles and criteria are appropriate, fully justified, proportionate, reasonable, comprehensive and consistent with the latest national policy, or whether they are unduly onerous and inflexible, adversely affecting the deliverability and viability of new development.
185. As drafted, the policy broadly reflects the core planning principles and design policies in the NPPF (¶ 17; 56-66; 97). Some elements of the criteria may be rather subjective and involve matters of judgement, but SDC confirms that a consistent approach will be adopted, reflecting the views of statutory bodies and technical experts. It provides an effective framework of relevant considerations, linked to the associated delivery policies, without being unduly prescriptive. Detailed requirements relating to crime prevention and safety, renewable and low-carbon energy, and Design & Access Standards are referred to in the NPPF (¶ 58-59; 97), PPG or in other legislation. SDC intends to take a proportionate approach, requesting further technical reports or studies only where necessary. The requirements are clearly set out, with flexibility to consider site-specific, viability and other circumstances.

186. Delivery Policies ES1-ES5 & ES12-ES16 set out more detailed development requirements, covering sustainable construction techniques, renewable and low-carbon energy, environmental limits, water resources and flood risk, air quality, design of places, open space and public art contributions. The main issues are whether these requirements are unduly onerous or necessary, and whether they are consistent with the latest Government policy and ministerial statements, particularly relating to housing standards and zero-carbon homes.
187. In response, SDC has drafted a new Policy ES1 and amended supporting text to better accord with NPPF (¶ 95, 174, 177) and reflect the withdrawal of the Code for Sustainable Homes; a further amendment addresses energy efficiency and housing standards **[MM118-119]**. These amendments are needed to ensure that the policy is sound and consistent with the latest Government policy. Reference is also made to a “check-list”, to ensure that sustainable construction is addressed at the outset; these draft check-lists introduce nothing that is not required under current national legislation/Building Regulations.
188. Policy ES2 sets out the requirements for new development in terms of renewable or low-carbon energy generation, covering many of the aspects referred to in the NPPF (¶ 17; 93-98) & PPG [ID:5]. However, in order to reflect Ministerial statements about cumulative impact on the landscape and visual impact, particularly from on-shore wind farms, and ensure that the planning impacts identified by affected local communities have been fully addressed, amendments to the policy are needed **[MM120-123]**. SDC does not intend to identify suitable areas for renewable/low-carbon energy schemes, but sets out the criteria for considering such proposals, including their justification, impact on amenity and landscape, and engagement with local communities. With these amendments, Policy EC2 provides an appropriate framework for considering proposals for renewable and low-carbon energy generation, which is consistent with the latest national policy.
189. Policies ES3-ES5 set out criteria for new development to address environmental limits, water resources, flood risk and air and water quality. These policies have been discussed with the relevant statutory bodies, including the EA, and amendments are necessary to take into account recent Ministerial statements and amendments to the Flood Risk PPG [ID:7] about Sustainable Drainage Measures. They clearly set out how the policies will be applied, including explanations of more subjective terms such as “overbearing”. As amended **[MM124-126]**, the policies are effective, consistent with NPPF (¶ 17; 95; 99-108; 110; 120; 123; 162; 165-167; 192) and soundly based.
190. Policy ES12 sets out criteria for new development covering design quality, broadly reflecting the NPPF (¶ 8-9; 56-66) & PPG [ID:26]. Good design is a key element of sustainable development, and the policy requirements are not inconsistent with the latest Government policy on housing standards, nor unduly prescriptive or onerous. Policies ES13-ES15 help to provide an appropriate framework for protecting existing open space, providing new greenspace and outdoor play space, and preparing a strategic framework for green infrastructure. They broadly reflect national policy in the NPPF (¶ 8-11; 73-76), have been drafted after discussions with NE, and are supported by evidence on standards and Outdoor Play Space [CD/D13]. To clarify the application of the policy, an amendment is needed to refer to a forthcoming district-wide Strategic Framework for green infrastructure **[MM134]**. With this amendment, the policies provide an appropriate and effective framework for the provision of green infrastructure and open space, which is justified by evidence, consistent with national policy and soundly based.
191. Policy ES16 could be seen as being unduly onerous in seeking contributions to public art. However, it relates to the need to establish a strong sense of place and promote cultural well-being (NPPF: ¶ 58; PPG: ID:26), is supported by the Public Realm Study [CD/D5], and reflects the particular historic, literary, cultural and artistic associations within Stroud district. The policy confirms that any contributions would be *proportionate* and relate only to larger scale proposals,

and its requirements have been taken into account in the Viability Studies [CD/F19; PS/B6]. Consequently, it is appropriate, effective, justified, soundly based and consistent with national policy.

A quality living and working countryside

192. Core Policy CP15 sets out the approach to development outside the identified limits of settlements. It is a key element of the strategy to concentrate most new development at the higher-order settlements, whilst enabling some development to come forward at the smaller settlements, including affordable housing and other uses to meet local needs. As such, it would help to promote sustainable patterns of development and sustainable communities in rural areas, helping to prevent the spread of development outside existing settlements. The main issues are whether the approach outlined in the policy would help to support sustainable development in the rural area, and whether the principle of establishing settlement limits and the approach to development outside such limits is appropriate, justified, effective and consistent with national policy.
193. NPPF (¶ 54-55) confirms that, in promoting sustainable development in rural areas, housing should be sited where it will enhance or maintain the vitality of rural communities, with further guidance in the PPG [ID:50]. By expecting new housing outside designated settlement limits to reflect local needs in a sustainable way, the policy is broadly consistent with national policy. It is also important to recognise the need to actively manage patterns of growth, focus development in the most sustainable locations and make the best use of existing facilities and public transport links. The policy positively addresses the balance between promoting sustainable development in rural areas and the need to protect the character, qualities and diversity of the countryside.
194. The issue of establishing development limits is often controversial, both for the local communities and developers and landowners, but it helps to manage growth and direct new development to the most sustainable locations. The principle was established in the previous local plan, and both the policy and the settlement boundaries have been reviewed during the preparation of the SDLP [PS2/B02k]. The detailed criteria in the policy broadly reflect the types of appropriate development referred to in the NPPF (¶ 54-55), and will enable development to meet local needs, including affordable housing, agricultural, economic and community uses. However, a further criterion is needed to ensure the policy is effective, covering enabling development to maintain a heritage asset **[MM117]**.
195. The policy does not preclude all development outside the defined settlement boundaries, but limits it to development which would meet local needs or is appropriate to the rural area; such development could also come forward as a result of windfalls or proposals in neighbourhood plans. Few representations have been made about specific settlement boundaries, and SDC has made appropriate and sound judgements about these detailed boundaries, such as at Painswick [PS2/B03k], some of which lie within the AONB. However, a further amendment is needed to ensure that the policy is effective, to clarify the circumstances where development will be permitted outside the defined settlement limits **[MM117]**.
196. Policy ES6 sets out the approach to protect biodiversity and geodiversity, including European, national and local ecological sites. It has evolved following discussions with NE [REX/B04], and has regard to the various iterations of the HRA, along with national policy in the NPPF (¶ 109-119) & PPG [ID-8]. A key outstanding matter relates to the impact of new developments on the Rodborough Common and Severn Estuary SACs, but SDC has agreed an interim mitigation and avoidance strategy for Rodborough Common with NE for housing within an identified 3km catchment [PS2/D11]. Further detailed work will need to be undertaken, particularly for the development proposed at Sharpness, but this does not detract from the overall soundness of these allocations. On this basis, given the agreements with NE and the agreed changes to Policy ES6 and the supporting text **[MM127-130]**, the approach is appropriate, effective, justified and in line with national policy.

197. Policies ES7-ES8 address landscape character, trees, hedgerows and woodlands, and equestrian development. Policy ES7 sets out criteria against which development proposals will be considered, including within the Cotswolds AONB, in line with NPPF (¶ 113); the associated PPG [ID:8] confirms that this covers development proposals which might have an impact on the setting and implementation of the statutory purposes of protected areas, such as AONBs. Reference to Landscape Character Assessments helps to provide an objective and consistent way of assessing the impact of new developments on the landscape. Policy ES8 aims to enhance and expand the district’s tree and woodland resource and avoid the loss of important trees, hedgerows and woodlands, reflecting NPPF (¶ 118). Policy ES9 provides clear policy guidance on the keeping of horses for recreational purposes and equestrian development, which has an important economic role to play in the rural areas of Stroud, whilst recognising the impact on sensitive landscapes such as the Cotswolds AONB. These policies provide an appropriate, effective, justified and soundly based framework against which to consider the impact of development within the landscape of the area.
198. Policy ES10 sets out principles to preserve, protect or enhance the district’s historic environment, reflecting national policy (NPPF; ¶ 126, 133-135), and recognising the particular heritage assets within this district, including the many conservation areas, listed buildings, scheduled monuments and other historic buildings, parks, gardens and significant sites. The policy wording has evolved following discussions with EH/HE, and with the agreed changes **[MM131-133]**, the policy is appropriate, justified, effective, soundly based and consistent with national policy.
199. Policy ES11 highlights the need to maintain, restore and regenerate the district’s canals, some of which are actively undergoing restoration, with some committed funding, including the Cotswold Canals. These canals are particularly important, not only as a recreational resource and heritage asset, contributing to economic and regeneration objectives, but also as a passive transport and biodiversity/green infrastructure corridor. As such, the policy is entirely appropriate, effective, justified and soundly based.
200. With the proposed amendments **[MM115-134]**, these policies provide an appropriate, effective and soundly based framework for protecting, maintaining and enhancing the environment within Stroud district, including providing high quality sustainable development and maintaining a quality living and working countryside, adapting to climate change, maintaining quality of life, protecting the built and natural environment, and protecting existing and providing new open spaces, which is fully justified and consistent with national policy.

MATTER 7 – DELIVERY & MONITORING

Key issue – Does the Plan provide an appropriate, effective and soundly based framework for the delivery of infrastructure, including the costing, funding, viability, deliverability and timing of critical infrastructure required to deliver the strategy, which is fully justified with evidence and consistent with national policy?

201. Section 7 of the Plan outlines the way in which the SDLP will be implemented, summarising the delivery mechanisms and introducing the Monitoring Framework (Appx 1). It confirms that the delivery of the development strategy will require a wide range of private, public and voluntary bodies working together, and recognises the role of Neighbourhood Plans. It also confirms that SDC will keep housing land supply under review to ensure that a 5-year supply is maintained throughout the plan period. The Monitoring Framework sets out targets (where appropriate) and indicators for each policy in the Plan. It is supported by key evidence, including the IDP [CD/C6; PS/E23], which sets out the critical elements of infrastructure, with timing, costing, bodies responsible and implementation.

202. Although the Plan does not specifically include a phasing policy to manage development, the housing trajectory shows how housing supply is likely to come forward during the plan period, confirming that sufficient supply of deliverable and developable sites can be identified throughout the plan period. Strategic sites will need to be phased, to reflect the lead-time needed to prepare and develop such sites, and to ensure a balanced delivery of housing and employment development, but this will be achieved through master-planning, development briefs and planning conditions. Issues about 5-year housing supply, including the “buffer” and delivery rates, have been dealt with earlier in my report. A revised table and graph showing housing supply and delivery is to be added to this section of the Plan [PS2/D32] **[MM135]**, making it effective and up-to-date.
203. SDC confirms that regular monitoring will take place, including annual assessments of housing and employment land availability, along with a new-style monitoring report outlining progress of preparing key planning documents and meeting key planning objectives, continuing to meet Duty to Co-operate requirements, and other relevant land-use and transport matters [PS2/B02I].
204. On this basis, the arrangements for monitoring the Plan’s policies are adequate, effective and comprehensive, with the framework aligned to the spatial vision, objectives and policies, including a range of key indicators to be regularly monitored. Delivery mechanisms, phasing and timescales for implementation are clearly set out, directly linked to the IDP, which will be regularly updated as part of the monitoring process. However, some detailed amendments to some of the targets and indicators, including those related to heritage assets, are needed to reflect the views of statutory bodies **[MM136]**; various amendments are also necessary to the glossary definitions and Policies Map **[MM137-146]**.
205. The Plan and its policies also include sufficient flexibility to take account of unexpected circumstances, including achieving a significant boost in housing supply by setting a minimum “at least” overall requirement. This would provide flexibility to enable other sustainable developments to come forward, including windfall sites and proposals coming forward from neighbourhood plans, ensuring that housing supply is robust and meets local needs. Most importantly, Policy CP2 contains a mechanism for early review of the SDLP within five years of adoption to address any unmet needs that may be subsequently identified; this is supported by a SOC with adjoining authorities [REX/B09].
206. With the recommended amendments **[MM135-146]**, the Plan provides an appropriate, effective and soundly based framework for monitoring and the delivery of infrastructure, which is fully justified and consistent with national policy.

MATTER 8 – OMISSION SITES

Key issue – If there is a need to identify additional or alternative sites for housing development to meet the identified housing requirement or replace proposed site allocations because they are undeliverable, unviable or otherwise unsound, which sites should be considered, and are such sites suitable, sustainable, available, deliverable, developable, viable and consistent with the development strategy?

207. Around 40 alternative or additional “omission” sites are promoted by developers or landowners. However, since the SDLP fully meets the identified housing requirement and none of the strategic sites have been found undeliverable, unviable or otherwise unsound, it is not necessary to consider these other sites in detail; none of these “omission” sites are needed to deliver the preferred strategy. SDC has considered all the other sites being promoted at various stages of the local plan preparation process [PS2/B02m/n], and none perform better in terms of overall sustainability appraisal than the proposed sites.
208. Many of these omission sites would not reflect the underlying strategy of the SDLP. Further large-scale housing developments in the south of Gloucester fringe (such as at Hardwicke or Whaddon) would shift the focus away from the main settlements in Stroud district and involve greenfield sites on the fringe of

Gloucester city. These sites perform no better than SDC’s preferred site at Hunts Grove and would not have the benefits of consolidating committed development and utilising the new infrastructure being provided there. At Hardwicke, large-scale development of up to 1,500 dwellings could remove the distinct identity of Hardwicke village from the urban area of Gloucester. Land at Whaddon is essentially an area of search for up to 3,000 dwellings, but there is some uncertainty about the precise amount or extent of proposed development to meet Stroud’s needs in terms of a specific allocation; development here would also represent a major incursion into the countryside to the south of Gloucester. Whaddon also performed less well in comparison to the proposed strategic site at West of Stonehouse. Furthermore, GCC currently objects to any further development in the south of Gloucester fringe within Stroud district.

209. Many sites involve greenfield land outside settlements, particularly those lower in the hierarchy, without a full range of facilities and services; these sites would not fall within the SDLP’s strategy. Some sites are not well related to the size and character of the existing settlement, and many have landscape or heritage issues or specific constraints which might prevent or delay their development. These include sites at Chalford, Minchinhampton, Upton St Leonards, Kings Stanley, Painswick, Kingswood, Rodborough and Whitminster, some of which are ruled out due to their location within the Cotswolds AONB or proximity to Rodborough Common SAC. SDC has considered a specific site east of Berkeley as a possible allocation, but there are landscape and heritage issues, including impact on Berkeley Castle, with objections from EH/HE; a recent planning application was refused [PS2/D12]. Further development south of Sharpness might complement the new Science & Technology Park, but few details are available; the site would be some distance from strategic facilities and could have an adverse impact on the Severn Estuary SAC.
210. Alternative sites around Cam and Dursley, such as Elm Lodge, Lower Knapp Farm and land east of Dursley, would represent a significant intrusion into the surrounding countryside, with adverse impacts on the landscape and setting of the settlement. Alternative sites around Stonehouse raise issues of landscape, heritage and wildlife impact. Most of the alternative sites promoted around Stroud are within, or would have an adverse impact on, the Cotswolds AONB; others, like Dark Mill/Lewiston Mill, already have permission for new housing. Some sites, like Aston Down, are remote from the nearest settlement and lie within the AONB, whilst others have poor access. Some are too small to be considered as strategic allocations, and in some cases, the deliverability and developability has not been demonstrated.
211. In particular, none of the other sites promoted by developers would include a mix of uses, including employment uses, a key requirement of strategic site allocations in the SDLP’s strategy. Consequently, since there is no need to identify any additional or alternative sites to meet current housing requirements, and none of the suggested sites perform better than those proposed in the amended SDLP, it is not necessary to consider these as additional or alternative allocations.

Other matters

212. Other matters were raised in the representations and at the hearings which do not go to the heart of the soundness of the Plan or relate to more detailed matters concerning specific proposals or planning applications. In many cases, “improvements” to the Plan are suggested, particularly in terms of the clarity and coherence of the strategy and policies. In response, SDC proposes several minor changes to the wording of the policies and accompanying text as “Additional Modifications”, but these do not directly affect the overall soundness of the Plan. Having considered all the other points made in the representations and at the hearing sessions, including those relating to the Post-Submission and Further Post-Submission Proposed Changes, there are no further changes needed to ensure that the Plan is sound in terms of the NPPF and associated guidance.

Overall Conclusion and Recommendation

213. The submitted Plan has a number of deficiencies in relation to soundness for the reasons set out above, which mean that I recommend that it is not adopted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.
214. The Council has requested me to recommend Main Modifications to make the Plan sound and legally compliant and capable of adoption. I conclude that with the recommended Main Modifications set out in the attached Appendix, the Stroud District Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Stephen J Pratt

Stephen J Pratt

Inspector

Appendix: Main Modifications required to make the plan sound and capable of adoption

Stroud District Local Plan:

Schedule of Main Modifications

September 2015

Schedule of all post-submission proposed Main Modifications.

This schedule has been prepared at the Inspector's request. It brings together a complete list of all the post-submission proposed changes to the Plan, sequenced in the order in which they would appear in the Plan. Each change is identified with a numerical reference, prefixed "**MM**" ("Main Modification").

This schedule includes all the proposed changes that were subject to public consultation in February/March of this year and all the *further* proposed changes* that were subject to consultation in July/August.

In a few instances, changes that were proposed in February/March (identified with the prefix "**PSC**") have been further modified or superseded by changes that were proposed in July/August (prefixed "**MOD**"). In such instances, the changes have been amalgamated into a single 'MM' proposed change and the relevant 'PSC' and/or 'MOD' references are noted in the column alongside.

* This schedule also incorporates a small number of further minor amendments to the *further proposed changes* (i.e. the "**MOD**" changes). These minor amendments directly address matters that were raised by respondents to the consultation (July/August 2015). They are itemised and explained in the Council's Statement of Consultation (September 2015). In such instances, the changes are described as "*as amended*".

Schedule of Main Modifications

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
Chapter 2: Making Places: The Development Strategy			
MM 001	PSC 001	Paragraph 2.5 Strategic Objective SO4	Amend <u>SO4</u> to: "Strategic Objective SO4: Transport and travel Promoting healthier alternatives to the use of the private car and seeking to reduce CO2 emissions by using new technologies, <u>active travel and/or smarter choices working towards a more</u> and encouraging an integrated transport system to improve access to local goods and services."
MM 002	PSC 002 and PSC 003	Paragraph 2.5 Strategic Objective SO5	Add to <u>SO5</u> bullet criteria: <u>Strategic Objective SO5: Climate Change and environmental limits</u> "Promoting a development strategy that mitigates global warming, adapts to climate change and respects our environmental limits by: • Securing energy efficiency through building design • Maximising the re-use of buildings and recycling of building materials • Minimising the amount of waste produced and seeking to recover energy • Promoting the use of appropriately located brownfield land • <u>Supporting a pattern of development that facilitates the use of sustainable modes of transport</u> • Minimising and mitigating against future flood risks, <u>and</u> recycling water resources and <u>protecting and enhancing the quality of the District's surface and groundwater resources.</u>"
MM 003	MOD 01	Paragraphs 2.26 – 2.29	Amend paragraphs to reflect a revised Local Plan housing requirement, as follows: "2.26 The chart below illustrates the <u>A</u> range of alternative projections which have been assessed, in order to determine the most appropriate target for Stroud District. 2.27 You can find more information about the projection methodologies and the evidence that Council has

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			considered through the evidence base section of our Local Plan website: www.stroud.gov.uk/core 2.28 The Council resolved in October 2012 to adopt a housing requirement target for Stroud District of a minimum of 9,260 dwellings with reserve position for up to 11,500 dwellings. Following the publication of more up to date 2011 based household projections in April 2013, the Council received recommendations to reduce the range to at least 9,260 dwellings and up to 10,500 dwellings. 2.29 This Plan identifies a target of at least 9,500 11,400 dwellings for up to the period between 2006-2031. The evidence suggests that this figure will be sufficient to support the economic growth likely to take place within the District <u>and to provide a modest uplift to the demographically assessed housing need in order to reflect the need for affordable housing. In addition to this figure, this Plan identifies a target of 950 additional bedspaces in Class C2 care homes to meet the needs of elderly people.</u>
MM 004	MOD 02	Paragraph 2.30	Amend paragraph to reflect a revised Local Plan housing requirement, as follows: “Many of these 9,500 11,400 dwellings have already been built or are firm “commitments” (i.e. they have been given permission but are yet to be completed; or they are awaiting signing of legal agreements). This means that the residual number of homes that the Local Plan must identify is actually around 2,400 at least 3,615 dwellings. The table below illustrates this.”

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
MM 005	MOD 03 (as amended)	Paragraph 2.30 (table)	Update table to reflect a revised Local Plan housing requirement, as follows:
			Calculating our residual housing requirement up to 2031
			Supply
			A Completions (1 April 2006 to 31 March 2012 2014) 2,379 3,264
			B Completions between 1 April 2012 2014 and 31 March 2013 2015 408 573
			C Total Completions (= A + B) 2,787 3,837
			D Large site commitments at 1 April 2013 2015 (10+ dwellings) [sites with planning permission, including sites either not started or under construction] 3,674 3,307
			E Small site commitments at 1 April 2013 2015 (1-9 dwellings) [sites with planning permission, including sites either not started or under construction] 470 551
			F Other firm commitments at 1 April 2013 2015 [sites subject to Section 106 legal agreement] 160 90
			G Total Commitments (= D + E + F) 4,304 3,948
			H Total Completions and commitments (= C + G) 7,091 7,785
MM 006	PSC 004	Paragraph 2.34	Requirement
			I <u>Minimum</u> Housing Requirement (1 April 2006 to 31 March 2031) 9,500 11,400
			J <u>Minimum</u> Residual Housing Requirement to 2031 (= I – H) 2,409 3,615
MM 006	PSC 004	Paragraph 2.34	Add " <u>at Stonehouse</u> " after "at Stroud".

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
MM 007	PSC 005 and MOD 04	Paragraph 2.34 (table)	Update table to reflect a revised Local Plan housing requirement, as follows:
			Strategic Sites
			Hunts Grove Extension 500 750
			North East Cam 450
			Sharpness 300
			Stroud Valleys 300 450
			<u>West of Stonehouse</u> 1,350
			Non-site specific allowance
			Council housing programme 150
			Dispersal / windfall 750
			Total At least 2,450 4,000 4,200
MM 008	PSC 006	Paragraph 2.41	Replace " Growth Plan " with " <u>Strategic Economic Plan</u> ".
MM 009	MOD 05	Paragraph 2.42	Amend paragraph to reflect a revised Local Plan employment requirement, as follows: "The latest forecasts suggest the need to plan for around 6,200 <u>between 6,800 and 12,500</u> net new jobs (2006-2031). A range of forecast models suggest that the District has a significant oversupply of employment land to meet these requirements. However, these models take no account of pent up demand, failures in the property market or the need for a range of sites and locations to provide for choice and continuum of supply beyond the Plan period. Based upon past take-up rates, there is a need to provide about 37 ha <u>58 ha</u> of additional employment (B1-B8) land (2012-2006 to 2031).

Change number	Consultation ref.	Paragraph / Policy	Proposed Change																					
MM 010	PSC 007	Paragraph 2.51	Amend second sentence of para 2.51 to read "For example, the Gfirst LEP Strategic Economic Plan (SEP) (2014) identifies that there are major opportunities for future economic growth along the M5/A38 corridor which is the property market focus for sub-regional industrial and modern office demand"																					
MM 011	PSC 008 and MOD 06	Paragraph 2.73	Replace paragraph 2.73 with the following text: "If local planning authorities in the housing market area can demonstrate through their local plan process that there are unmet development and infrastructure needs that could be met more sustainably through provision in Stroud District, these will be considered, including through an early review of this Local Plan, commencing <u>within</u> five years from adoption or in <u>by</u> December 2019, whichever is the sooner."																					
MM 012	MOD 07 <i>(as amended)</i>	Policy CP2	Amend Policy CP2 first paragraph to read: "Stroud District Council will accommodate at least 9,500 <u>11,400</u> additional dwellings, <u>950 additional care home bedspaces (2013-31)</u> and 6,200 additional jobs <u>58 hectares of additional employment land</u> for the period 2006-2031."																					
MM 013	PSC 009 and MOD 08	Policy CP2	Amend table in CP2 to reflect a revised Local Plan housing requirement, as follows:																					
			<table><tr><th>Location</th><th>Employment</th><th>Housing</th></tr><tr><td>Hunts Grove Extension</td><td></td><td>500 <u>750</u></td></tr><tr><td>Quedgeley East</td><td>13 ha</td><td></td></tr><tr><td>North East Cam</td><td>12 ha</td><td>450</td></tr><tr><td>Sharpness</td><td>17 ha</td><td>300</td></tr><tr><td>Stroud Valleys</td><td>Intensification</td><td>300 <u>450</u></td></tr><tr><td><u>West of</u> Stonehouse</td><td>10 ha</td><td><u>1,350</u></td></tr></table>	Location	Employment	Housing	Hunts Grove Extension		500 <u>750</u>	Quedgeley East	13 ha		North East Cam	12 ha	450	Sharpness	17 ha	300	Stroud Valleys	Intensification	300 <u>450</u>	<u>West of</u> Stonehouse	10 ha	<u>1,350</u>
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			Stroud Valleys	Intensification	300 <u>450</u>																			
<u>West of</u> Stonehouse	10 ha	<u>1,350</u>																						
MM	PSC 010	Policy CP2	Replace the final sentence of <u>Policy CP2</u> with the following text:																					

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
014			<u>“Stroud District Council will give due consideration to the need to assist other local planning authorities in this housing market area in meeting their unmet objectively assessed development and infrastructure needs, including through an early review of this Local Plan, to ensure that any shortfalls that may arise in the delivery of housing and employment growth (as identified through the other authority’s local plan process) are provided for in sustainable locations.”</u>
MM 015	MOD 09	Policy CP3	Amend Policy CP3 description of Fifth Tier settlements to read: “These remaining settlements have a lack of basic facilities to meet day to day requirements. and no development is envisaged. However, there could be scope for very limited development, should this be required to meet a specific need identified by these communities in any Neighbourhood Plans.”
MM 016	MOD 10	Policy CP4	Amend Policy CP4 first paragraph to read: “All development proposals shall accord with the Mini-Visions and <u>have regard to</u> the Guiding Principles for that locality...”
MM 017	PSC 011	Policy CP4	Amend point 2 of <u>Policy CP4</u> to: "2. Place-shape and protect or enhance a sense of place (create a place with a locally-inspired or distinctive character – whether historic, traditional or contemporary – using appropriate materials, textures and colours, locally-distinctive architectural styles, <u>working</u> with the site topography, orientation and landscape features; as well as conserve or enhance <u>protecting or enhancing</u> local biodiversity interest, <u>the historic environment and any heritage assets</u>);”
MM 018	PSC 012	Policy CP5	Amend clause 3 criterion to: "3. Be readily accessible by bus, bicycle and foot to shopping and employment opportunities, key services and community facilities; and <u>will</u> contribute towards the provision of new sustainable transport infrastructure to serve the area, <u>in seeking to minimise the number and distance of single purpose journeys by private cars.</u> "
MM	MOD 11	Paragraph 2.92	“...In respect of legal agreements the Council anticipates producing a Supplementary Planning Document on the

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
019			types of contributions that will be sought, triggers and how these will be calculated. <u>The County Council has also produced a Local Developer Guide to assist with discussions regarding developer contributions.</u>
MM 020	MOD 12	Policy CP6	Add to Policy CP6 the following final sentence: <u>"In determining the nature and scale of any provision, the Council will have regard to viability considerations and specific site circumstances."</u>
MM 021	PSC 013	Key Diagram	Add shape to show additional location for strategic housing growth to the west of Stonehouse.
Chapter 3: Making Places: Shaping the future of Stroud District			
MM 022	PSC 014	Vision Diagram 1.0	Add shape to show additional location for strategic housing growth to the west of Stonehouse.
Chapter 3: Making Places: Shaping the future of the Stroud Valleys			
MM 023	PSC 015	Vision Diagram 1.1	Add shape to show additional location for strategic housing growth to the west of Stonehouse.
MM 024	PSC 016	Paragraph 3.8	<u>Guiding Principles</u> for the Stroud Valleys: Amend "300" to " <u>450</u> ".
MM 025	PSC 017	Paragraph 3.8	<u>Guiding Principles</u> for the Stroud Valleys: Add criterion 13: <u>"13. Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan at this location."</u>
MM 026	PSC 018	Paragraph 3.8	<u>Opportunities, growth and key projects</u> for the Stroud Valleys: Amend "300" to " <u>450</u> ".

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
MM 027	PSC 019	Paragraph 3.9	<u>Opportunities, growth and key projects</u> for the Stroud Valleys: Add bullet: • <u>"Habitat Regulations Assessment accompanying the Stroud District Local Plan and National Trust 'Management Plan for Rodborough Common'"</u>
MM 028	PSC 020	Paragraph 3.10	<u>Key supporting evidence base</u> for the Stroud Valleys: Add bullets for: • <u>"Strategic Flood Risk Assessment (Levels 1 and 2) and Flood Risk Sequential Test (2014)"</u> • <u>"Stroud Infrastructure Delivery Plan (2014)"</u>
MM 029	MOD 13	Policy SA1	Amend Policy SA1 first paragraph (further to PSC 021) to read: Land within the Stroud Valleys at the following specific locations (as identified on the policies map) is allocated for mixed use development, <u>subject to viability and site specific circumstances</u>, including at least 450 dwellings."
MM 030	PSC 021	Policy SA1	<u>Strategic Allocation Policy SA1</u> Stroud Valleys: Amend "at least 300" to <u>"at least 450"</u>. Amend SA1c Ham Mill from "50" to <u>"100"</u>. Amend SA1d Brimscombe Port from "100" to <u>"150"</u>. Amend SA1f Wimberley Mills from "50" to <u>"100"</u>.
MM 031	PSC 022	Policy SA1	<u>Strategic Allocation Policy SA1</u> Stroud Valleys: Amend criterion 5 by deleting "to meet the requirements of the Environment Agency". Insert three additional criteria after criterion 5, to read: <u>"6. Adequate and timely infrastructure to tackle wastewater generated by that development in accordance with the Infrastructure Delivery Plan and with agreement of the relevant water companies."</u> <u>"7. Be supported by an acceptable Flood Risk Assessment, which also addresses the Flood Risk Sequential Test document recommendations that accompanied this Local Plan."</u>

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			<u>"8. Improvements to, and restoration of, the river corridor for biodiversity and flood risk enhancements."</u> (re-number remaining criteria)
MM 032	PSC 023	Policy SA1	<u>Strategic Allocation Policy SA1</u> Stroud Valleys: Amend former criterion 8 to read: " 8. <u>11.</u> Contributions towards bus services to improve bus frequencies and quality, and to connect the development with Stroud and adjoining settlements <u>as part of a wider managed, safe and accessible transport network.</u> "
MM 033	PSC 024	Supporting text for policy SA1: Paragraph 3.13	Amend land at Dudbridge bullet: "Land at Dudbridge has potential, in addition to employment provision, for canal related tourism and retail development provided it is compatible with the retail hierarchy. <u>The site is significantly constrained by functional floodplain and any redevelopment should not result in any net loss of flood storage. Safe and emergency access considerations are paramount and will need to be fully resolved.</u> A new access to the site will be achieved from Dudbridge Road. There is potential to enhance significantly this gateway location into the town and the setting of the canal."
MM 034	PSC 025	Supporting text for policy SA1: Paragraph 3.13	Amend Ham Mills bullet: "Ham Mills has potential for <u>apartment</u> housing and high quality office space, focussed on achieving the conservation and adaptation of the historic mill and enhancement of its setting. <u>No development should take place in Flood Zones 3a and 3b at the south eastern end of the site. This area will act as a natural buffer to the river.</u> "
MM 035	PSC 026	Supporting text for policy SA1: Paragraph 3.13	Amend Brimscombe Mill bullet: "Brimscombe Mill has potential for both housing and employment redevelopment to achieve environmental enhancements and to create a restored mill pond. <u>The site should not be developed until the adjoining Cotswold Canal has been reinstated from Brimscombe Port to Ocean Bridge, or until a site specific Flood Risk Assessment demonstrates that the site can be safely developed, with more vulnerable development</u>

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			<u>being located in Flood Zone 1 and without increasing flood risk on or off site."</u>
MM 036	PSC 027 and MOD 14	Supporting text for policy SA1: Paragraph 3.13	Amend Brimscombe Port bullet: "Brimcombe Port has opportunities to provide canal related facilities including moorings on a reinstated stretch of water <u>and port basin</u>, enhancing listed buildings, providing new visitor facilities as well as housing and high quality employment development. A new access from the A419 to the east of the site will be achieved to improve site accessibility. <u>The site should not be developed until the adjoining Cotswold Canal has been reinstated from Brimscombe Port to Ocean Bridge, or until a site specific Flood Risk Assessment demonstrates that the site can be safely developed without increasing flood risk on or off site."</u>
MM 037	PSC 028	Supporting text for policy SA1: Paragraph 3.13	Amend Wimberley Mills and Dockyard Works bullet: "Wimberley Mills and Dockyard Works have potential, subject to the relocation of existing businesses, for comprehensive redevelopment for housing and high quality employment space, including opportunities to de-culvert the river. <u>It is essential that development at Wimberley Mills de-culverts the River Frome to take the site out of the floodplain. Development at Dockyard Works is expected to be phased after the Wimberley development has been completed and to include de-culverting of the Toadsmoor Stream on-site and reinstatement and maintenance of the adjacent Canal channel off site. These measures are to enable development by reducing flood risk and improving river corridor functioning.</u> Development will require a comprehensive solution to achieve satisfactory access through Knapp Lane and Toadsmoor Road to the A419."
Chapter 3: Making Places: Shaping the future of the Stonehouse cluster			
MM 038	MOD 15	Vision 1.2 Stonehouse Cluster	Amend the Stonehouse mini-vision (Vision 1.2) second paragraph as follows: "Development to the west of Stonehouse will expand the existing Oldends/Stroudwater employment area, with attendant transport and infrastructure improvements – including improved links to the town centre and opportunities for all to make use of pleasant and safe 'green links' on foot or cycle. This will be a sustainable workplace destination for the District, <u>as well as a vibrant new community, served by its own local centre."</u>

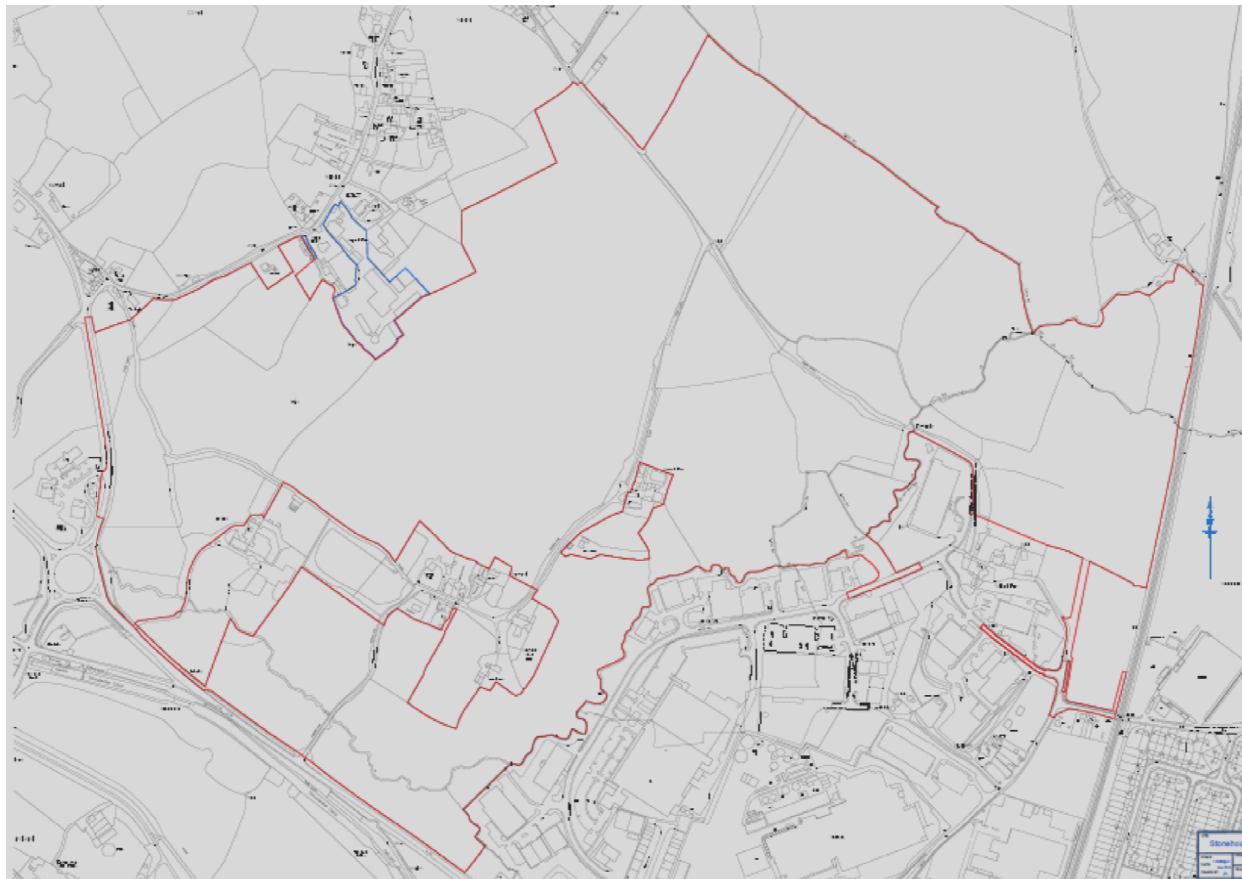
Change number	Consultation ref.	Paragraph / Policy	Proposed Change
MM 039	PSC 029	Vision Diagram 1.2	Add shape to show additional location for strategic housing growth to the west of Stonehouse. Amend label to read “West of Stonehouse: Major employment area and location for strategic housing and employment growth over the plan period” Add shape to show location for new local centre at the allocation West of Stonehouse. Amend map key to show “Location for a new local centre (West of Stonehouse)”
MM 040	PSC 030	Paragraph 3.17	<u>Guiding Principles</u> for the Stonehouse cluster: Amend first criterion to read: "1. This area will continue to be a major employment focus for the District. Land to the <u>west of Stonehouse will be a focus for the District's strategic growth, providing 1,350 homes and</u> up to 2,000 jobs by 2031".
MM 041	PSC 031	Paragraph 3.17	<u>Guiding Principles</u> for the Stonehouse cluster: Add criterion 12: "<u>12. Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan at this location.</u>"
MM 042	PSC 032	Paragraph 3.18	<u>Opportunities, growth and key projects</u> for the Stonehouse cluster: Replace first bullet point with: "<u>1,350 new homes plus significant employment development (up to 2,000 jobs) on land to the west of Stonehouse</u>". Add new bullet point: "<u>Provision of a new primary school, local centre, community facilities and open space</u>".
MM 043	PSC 033	Paragraph 3.19	<u>Key supporting evidence base</u> for the Stonehouse cluster: Add: "<u>Strategic Flood Risk Assessment (Levels 1 and 2) and Flood Risk Sequential Test (2014)</u>" and "<u>Stroud Infrastructure Delivery Plan (2014)</u>"
MM 044	PSC 034 and	New Policy SA2	Delete current <u>Strategic Allocation Policy SA2</u> North of Stonehouse Industrial Estate and map. Replace with new Policy SA2 West of Stonehouse:

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
	MOD 16 MOD 17 MOD 18		<u>Policy SA2 West of Stonehouse</u> Land west of Stonehouse, as identified on the policies map, is allocated for a mixed use development including residential, employment and community uses. A development brief incorporating a design vision and a masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner. This will address the following: 1. 1350 dwellings, including at least 405 (30%) affordable dwellings, unless viability testing indicates otherwise 2. 10 hectares of B1, B2 and B8 employment land 3. A local centre incorporating local retail and community uses to meet the needs of the development 4. A 2 form entry primary school and contributions to secondary school provision 5. Contributions to local community services 6. Accessible structural natural greenspace, allotments and formal public outdoor playing space including sports pavilion/community building 7. Structural landscaping buffer around Nastend and to the east of Nupend incorporating existing hedgerows and trees 8. Long term management and maintenance of open spaces to deliver local biodiversity targets 9. The acceptable management, maintenance and disposal of surface water including sustainable urban drainage systems (SuDs) 10. Restored watercourse corridor that enhances biodiversity and water quality and improves flood storage and flow routes 11. Adequate and timely infrastructure to tackle wastewater generated by development in agreement with the relevant water companies. 12. Opportunities to improve transport connectivity with Stonehouse <u>and Stonehouse</u> town centre for pedestrians, cyclists, public transport and private car 13. Cycle and pedestrian routes through the development connecting Nastend and Nupend with the town centre, Stroudwater Industrial Estate and Oldends Lane and footpath links from the development to the surrounding rural network, including improvements to the canal towpath 14. Primary vehicular access from A419 Chipmans Platt roundabout and additional vehicular access from Brunel Way and Oldends Lane

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			15. Traffic calming measures within the development and locality as approved by the Highways Authority 16. Bus stops and shelters at appropriate locations to serve the new development 17. Contributions towards bus services to improve bus frequencies and quality and to connect the development with <u>Stonehouse and Stonehouse</u> the town centre 18. Contributions towards the provision of a new railway station at Stonehouse, <u>subject to the plans of Network Rail</u> 19. Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan in this location 20. Phasing arrangements to ensure that employment land is developed and completed in parallel with housing land completions and community and retail provision is made in a timely manner.
MM 045	PSC 035 and MOD 19 MOD 20 MOD 21	Paragraphs 3.20 - 3.21 Supporting text to new Policy SA2	Delete supporting text and replace with: “Land west of Stonehouse is identified as a sustainable urban extension to Stonehouse, which will deliver a high quality mixed use development including housing, employment, local centre and open space that meets the day-to-day needs of its residents. Land west of Stonehouse is located north of the A419 between the Chipmans Platt roundabout and the Stroudwater Industrial Estate. The site comprises two parcels of land. Land to the south and west of Nastend will be retained primarily in existing uses but offering opportunities for ecological enhancement. The remaining land to the north and east of Nastend and the Industrial Estate will be developed for residential, employment and community uses including landscaping and open space. The site could accommodate 1350 dwellings, incorporating at least 30% affordable housing unless independently scrutinised viability testing indicates otherwise, a local centre and 10 hectares of B1, B2 and B8 employment land. Employment land should include high quality office space and opportunities should be explored for small, incubator and grow on business units and for provision which facilitates industrial symbiosis. Phasing arrangements will be put in place to ensure that employment land is developed and completed in parallel with housing land completions.

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			A local centre will be developed to incorporate local shopping, community uses and a 2 form entry primary school to meet the needs of the development and will be phased to ensure the new community has access to facilities in a timely manner. Contributions will also be required to secondary school provision and community services, for example funding for a community development officer and for extending opening hours at <u>Stonehouse library or other library infrastructure improvements</u>. Options for additional healthcare provision will be investigated. The site will deliver a high quality sustainable and distinctive mixed use development accommodated in a series of interlinked neighbourhoods within an extensive landscape framework. The design vision and form and design of the main perimeter elevations will be submitted to and agreed by the Council before reserved matters applications can be considered. Subsequent applications will be required to demonstrate how they conform to the design vision and masterplan. This will ensure that design quality is maintained through the build out of the development. The visual setting of Nastend Farm as generally experienced from Nastend Lane will be preserved and structural landscaping around Nastend and to the east of Nupend will maintain the separate character of these settlement areas. Accessible structural natural greenspace, allotments and formal public outdoor playing space in accordance with local standards and to meet needs arising from the development will be provided on-site. Long term management and maintenance of open spaces will be designed to deliver local biodiversity targets, including for orchards, Great-crested Newts and Barn Owls. The Council will seek opportunities to reduce the overall level of flood risk in the area through the layout and form of the development. Development here will need to comply with habitats regulation assessment recommendations and should include the appropriate application of sustainable drainage systems and create space for flooding to occur by improving flood flow pathways and by identifying, allocating and safeguarding open space for flood storage and biodiversity enhancements both on-site and off site. An archaeological evaluation has been carried out on the site and provision will be made for a programme of archaeological mitigation. The site is situated 4.5km east of the Severn Estuary SPA/Ramsar site. Due to the size of the development it will be necessary for the applicants to supply a report to inform a Habitat Regulations Assessment, which will

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			specifically investigate the potential recreational impacts of the new dwellings on the bird populations of the SPA/Ramsar site and consequently detail any measures that may be required to avoid a likely significant effect. Measures could include avoiding an overall increase in usage of the paths along the Estuary by providing alternative dog walking opportunities that would meet the local need, or by contributing to the emerging impact avoidance strategy for the Severn Estuary SPA and Special Area of Conservation (SAC). Vehicular access will be from A419 Chipmans Platt roundabout and from Oldends Lane. Opportunities to improve transport connectivity with Stonehouse and Stonehouse town centre will be investigated in accordance with a transport assessment to be submitted with the application. In addition, cycle and pedestrian routes will be provided through the development to Stroudwater Industrial Estate and Oldends Lane and footpaths will link the development to the surrounding rural network. Contributions will be made to ensure the canal towpath between Eastington and Stonehouse can accommodate the predicted increase in usage. Contributions towards improving the frequency and quality of local bus services to connect the development with Stonehouse and Stonehouse the town centre will also be provided and towards the provision of a new station at Stonehouse, <u>subject to the plans of Network Rail.</u>"
MM 046	PSC 036	New Policy SA2 Diagram	Insert new map showing the following site boundary for new allocation SA2 west of Stonehouse:

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			
Chapter 3: Making Places: Shaping the future of Cam and Dursley			
MM 047	PSC 037	Paragraph 3.22	Amend Paragraph 3.22: “Cam and Dursley adjoin each other and make up the District’s second largest population (after the Stroud

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			Valleys). This large conurbation sits nestled at the foot of the Cotswold hills (the AONB covers the southern half of this parish cluster area). The Cotswold Way runs through Dursley town centre, a conservation area which has recently seen some public realm improvements, as well as a major new supermarket development. The former <u>historic</u> market town has a population of over 6,500; whilst Cam has a small village centre, which has expanded to serve its larger population of 8,000+”.
MM 048	PSC 038	Paragraph 3.23	Amend Paragraph 3.23: "Both communities historically were a centre for cloth manufacturing. Other industries later boomed in Dursley town, including engine manufacture, furniture production and pin-making. The area has suffered from a degree of deprivation that has impacted on the local communities; according to 2011 census results, this is particularly acute in the area of education, skills and training; while the <u>emerging</u> 2020 Cam and Dursley Community Plan* highlights that businesses identify a local skills gap. A residents’ survey in 2007 showed long-term worklessness was prevalent in the “Vale Vision” area, with 60.6% of workless respondents having been out of work for 2 years or more. (Vale Vision was formed to produce a community Strategic Plan and represents Cam, Dursley and surrounding parishes, covering a population in excess of 18,000) <u>(*Vale Vision Development Trust Ltd is a community-led enterprise whose aims include improving and enhancing the quality of life for residents of Cam, Dursley and the surrounding parishes – a population in excess of 18,000. They were commissioned to prepare a Community Strategic Plan for the area).</u> "
MM 049	MOD 22	Paragraph 3.25	Amend Cam and Dursley <u>Guiding Principles</u> (para. 3.25, first point) to read: “1. Cam and Dursley will be a focus for the District’s strategic growth, providing up to 450 homes and up to 1,500 new jobs over the plan period (up to 2031)…”
MM 050	PSC 039	Paragraph 3.25	<u>Guiding Principles</u> for Cam and Dursley: Add criterion: " <u>12. Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan at this location.</u> "
MM 051	MOD 23	Paragraph 3.26	Amend Cam and Dursley <u>Opportunities, growth and key projects</u> (para. 3.26) to read: • Up to 450 Homes plus significant employment development (up to 1500 jobs) to the north east of Cam”

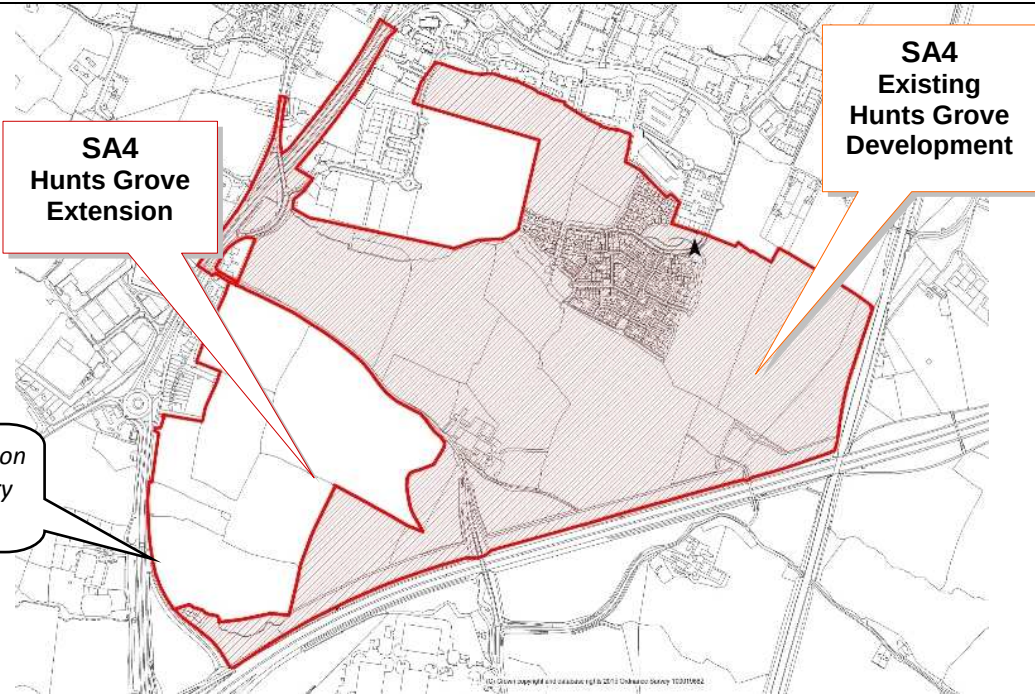
Change number	Consultation ref.	Paragraph / Policy	Proposed Change
MM 052	PSC 040	Paragraph 3.27	<u>Key supporting evidence base</u> for Cam and Dursley: Add: • "Strategic Flood Risk Assessment (Levels 1 and 2) and Flood Risk Sequential Test (2014)" • "Stroud Infrastructure Delivery Plan (2014)"
MM 053	PSC 041	Policy SA3	<u>Strategic Allocation Policy SA3</u>: North East of Cam: Amend criterion 4 by adding "and enhanced flood plain storage capacity." Amend criterion 7 by deleting "to meet the requirements of the Environment Agency". Add new criterion: "Adequate and timely infrastructure to tackle wastewater generated by the development, in agreement with the relevant water company, and including any other constraints referred to in the Stroud Infrastructure Delivery Plan." (Amend numbering of subsequent criteria).
MM 054	PSC 042	Paragraph 3.31	Add to supporting text "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."
MM 055	PSC 043	Paragraph 3.33	Amend first sentence of the paragraph to read: "A linear landscaped park along the line of the river corridor with provide natural greenspace, increased flood storage and adjacent public outdoor playing space, including changing rooms / community building."
Chapter 3: Making Places: Shaping the future of the Gloucester fringe			
MM 056	MOD 24	Paragraph 3.39	Amend Gloucester Fringe <u>Guiding Principles</u> (para. 3.39, first point) to read: "1. Hunts Grove will continue to be a focus for the District's strategic growth, providing a further 500750 homes through an extension to the development, bringing the total up to 2,2502,500 homes over the plan period (up to 2031) and becoming effectively a "Local Service Centre" in our settlement hierarchy. The

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			Hunts Grove Extension, <u>together with adjacent Quedgely East</u> , will represent a single key <u>focus for development allocation at on</u> the Gloucester Fringe."
MM 057	PSC 044	Paragraph 3.39	<u>Guiding Principles</u> for the Gloucester Fringe: Amend Criterion 6 to: "6. Improve non-motorised connections between the City suburbs and the rural hinterland; enhance the existing good transport links and movement corridors and allow good permeability through any new development for walkers and cyclists. <u>Development must not have a significant detrimental impact on the safe and efficient operation of Junction 12 of the M5.</u>"
MM 058	PSC 045	Paragraph 3.39	<u>Guiding Principles</u> for the Gloucester Fringe: Add new criterion: <u>"11. Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan at this location."</u>
MM 059	MOD 25 (as amended)	Paragraph 3.40	Amend Gloucester Fringe <u>Opportunities, growth and key projects</u> (para. 3.40) as follows: - Utilise land to the south of the existing <u>approved</u> Hunts Grove development area (1,750 homes already permitted under construction), <u>as an extension</u> to deliver 500<u>750</u> more homes <u>and supporting infrastructure as an integral part of the whole Hunts Grove new community area. Through comprehensive masterplanning demonstrate how the extension would complement the existing development to deliver a cohesive, well-connected and accessible community with convenient access to local services and facilities, including basic convenience shopping and community infrastructure</u> a new local centre as part of the development, to include basic convenience shopping and community facilities; opportunity to provide a comprehensive masterplan for the whole Hunts Grove area - A focus for employment growth and intensification at key employment sites near to Hunts Grove including an additional 13 ha at Quedgely East - Increasing open space provision as there is a 3.7 ha current shortage in outdoor play space - Land at Naas Lane (on the Hunts Grove development site) has been safeguarded as a location for a potential new railway halt <u>station. The land should continue to be safeguarded as part of any new</u>

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			<u>masterplan proposals and appropriate</u> contributions <u>sought</u> from development towards the provision of a railway station on the Gloucester-Bristol line, <u>subject to the plans of Network Rail</u> • New M5 Motorway Service Area (at Ongers Farm, Brookthorpe parish) • Land at Javelin Park is allocated in the Waste Core Strategy for a strategic residual recovery facility
MM 060	PSC 046	Paragraph 3.41	<u>Key supporting evidence base</u> for the Gloucester Fringe: Add: • <u>"Strategic Flood Risk Assessment (Levels 1 and 2) and Flood Risk Sequential Test (2014)"</u> • <u>"Stroud Infrastructure Delivery Plan (2014)"</u>
MM 061	MOD 26 and PSC 047 PSC 048	Policy SA4	Amend Policy SA4 to read: Hunts Grove Extension The full extent of the Hunts Grove new community is outlined on the Policies Map. The extension to the approved masterplan, on land to the south of Haresfield Lane, is also identified on the Policies Map. This is allocated for housing and supporting infrastructure. <u>The new community comprises the committed Hunts Grove development area (1,750 dwellings and supporting infrastructure) and the Hunts Grove extension, on land to the south of Haresfield Lane, which will deliver an additional 750 dwellings, including 225 affordable dwellings (unless viability testing indicates otherwise).</u> The development proposals <u>for the Hunts Grove extension</u> should be accompanied by a comprehensive masterplan, to be approved by the local planning authority, which demonstrates how the land uses and proposed infrastructure forming part of the Hunts Grove extension will be delivered as an integrated and compatible component of the overall Hunts Grove masterplan. <u>The development proposals will address the following: additional development will be integrated into the Hunts Grove new community and how the following components will be delivered to ensure that the new community is delivered in a cohesive and sustainable manner:</u> 1. The provision of an additional 500 dwellings within the overall new community (to create an urban extension of 2,250 dwellings) including 150 affordable dwellings, unless viability testing indicates otherwise <u>1. A local centre of sufficient scale to meet the day-to-day needs of the Hunts Grove new community as a</u>

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			whole, incorporating local retail and community uses 3. <u>2.</u> A primary school of sufficient scale to meet the needs of the development <u>Hunts Grove new community</u> 4. <u>3.</u> Accessible natural greenspace and publicly accessible outdoor playing-space, with appropriately scaled changing facilities 5. <u>4.</u> Structural landscaping buffer around the southern and western boundaries of the development incorporating existing hedgerows and trees, as appropriate 6. <u>5.</u> The acceptable management and disposal of surface water including sustainable urban drainage systems (SuDs) <u>to meet the requirements of the Environment Agency</u> 7. <u>6.</u> <u>Adequate and timely infrastructure to tackle wastewater generated by the development, in agreement with the relevant water company.</u> 8. <u>7.</u> <u>No built development will be located in Flood Zones 2, 3a or 3b. The Council will also seek opportunities to reduce the overall level of flood risk in the area and improve flood storage capacity through the layout, use and form of the development</u> 7-9. <u>8.</u> Cycle and pedestrian routes through the development connecting with Haresfield Lane and the existing Hunts Grove development 8-10. <u>9.</u> Primary vehicular access from the principal A38 junction serving the Hunts Grove new community, with secondary access from Waterwells Drive, <u>as part of a wider managed, safe and accessible transport network, identified in the evidence base transport assessments</u> 9-11. <u>10.</u> Access arrangements within the site to encourage use of public and sustainable modes of transport and to encourage lower vehicle speeds 10-12. <u>11.</u> Bus stops and shelters at appropriate locations to serve the new development 11-13. <u>12.</u> Contributions towards bus services to improve bus frequencies and quality; and 12-14. <u>13.</u> <u>Safeguarding of land for the provision of a potential future railway station and</u> Appropriate contributions towards the opening of the Hunts Grove railway station <u>(subject to the plans of Network</u>

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			<u>Rail).</u>
MM 062	MOD 27	Supporting text to Policy SA4: Paragraph 3.42	Amend supporting paragraph 3.42, final sentence, to read: “...The extension to Hunts Grove is intended to complete the development <u>provide certainty about the ultimate extent of development in this area and to provide further flexibility in delivering the required overall amount of housing. It will also</u> and support and extend the community infrastructure planned for in this location.”
MM 063	PSC 049 and MOD 28	Supporting text to Policy SA4: Paragraph 3.43	Amend supporting paragraph to reflect revised site boundary: “The Hunts Grove extension is located on land south of Haresfield Lane and north of the M5 junction 13. The site comprises approximately 26 <u>34</u> hectares of land to be developed for residential, supporting infrastructure, including landscaping and open space. <u>Areas identified within flood zones 2, 3a and 3b will be kept as open space.</u> ”
MM 064	MOD 29	Supporting text to Policy SA4: Paragraph 3.45	Amend supporting paragraph to reflect revised housing numbers on the site: “The extension to the Hunts Grove masterplan will deliver a net increase of 500 <u>750</u> dwellings. When complete, the new community will comprise 2,250 <u>2,500</u> dwellings together with the necessary supporting infrastructure, employment, social, commercial and community uses, which will include a primary school of sufficient size to meet the needs of the development.”
MM 065	MOD 30	Site Allocation SA4 map	Delete map showing SA4 and replace with new map showing revised site boundary, to include a further area of land to be allocated as part of the Hunts Grove Extension:

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			
MM 066	PSC 050	Policy SA4a	Amend the second sentence of <u>Strategic Allocation Policy SA4a</u> (Quedgeley East) to read as follows: "...The development of the site will provide contributions to off-site highway works including public transport, pedestrian and cycle links to Gloucester city, Stonehouse and Stroud, <u>in accordance with the recommendations of the evidence base transport assessments.</u>"
MM 067	PSC 051	Policy SA4a	Add the following sentence at the end of <u>Strategic Allocation Policy SA4a</u> (Quedgeley East): "<u>...The development must help to reduce the flood risk to the adjacent M5 Motorway by providing floodplain storage on site and keeping the floodplain and flow paths as open space.</u>"

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
MM 068	PSC 052	Supporting text to Policy SA4a: After 3.47	Insert a new paragraph which states: " <u>The Council will seek opportunities to reduce the overall level of flood risk in the area including flooding to the M5 motorway, through the layout and form of the development, the appropriate application of sustainable drainage systems and increased flood storage capacity. There will be no built development in flood zones 2, 3a and 3b. If car parking cannot be avoided in flood risk locations it should only be allowed if appropriate management plans are agreed and implemented. The plans must demonstrate appropriate flood resilience measures including safe access and escape routes in the event of a flood. A site specific Flood Risk Assessment will need to accompany any planning application to address the recommendations within the Sequential Test Document and the SFRA Level 2.</u> "
Chapter 3: Making Places: Shaping the future of the Berkeley cluster			
MM 069	MOD 31	Paragraph 3.48	Amend paragraph 3.48, final sentence, to read: " The growth of Sharpness Docks with increased shipping has not progressed as envisaged in the previous Local Plan: the former employment allocations have not been taken up and accessibility is an issue. <u>Whilst Sharpness Docks is a thriving and busy Port, the former employment allocations have not been taken up as envisaged in the 2005 Local Plan and accessibility remains an issue.</u> "
MM 070	MOD 32	Vision 1.5 Berkeley Cluster	Amend the mini vision for the parishes around Berkeley. Add the following wording to the second sentence within the second paragraph: "...Improvements to the working environment and leisure amenities at nearby Sharpness <u>and proposals for the Gloucestershire Science and Technology Park at the former Berkeley Nuclear Power Station site</u> will provide a <u>local</u> boost, and will act <u>acting</u> together with other attractions (including Berkeley Castle, Jenner Museum, Slimbridge Wildfowl and Wetlands trust and several safe and attractive walking and cycling routes) to raise the profile of this part of the District..."
MM 071	MOD 33 and PSC 053	Paragraph 3.51	Amend Berkeley Cluster <u>Guiding Principles</u> as follows: 1. "A vision for the regeneration of Sharpness Docks will be progressed including up to 300 new homes

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			over the plan period (up to 2031) in association with a leisure and recreation strategy for the north of the Docks and intensified and upgraded employment provision on new and existing sites within the commercial Docks to the south; land here will represent a single key strategic allocation in this 'vision area' to deliver this growth and sustain Sharpness / Newtown in its role as a Settlement with Limited Facilities (as defined in the proposed settlement hierarchy for the district). 2. <u>The former Berkeley Power station site will be redeveloped as the Gloucestershire Science and Technology Park, to include educational, training and research facilities, together with B1-B8 uses and uses associated with the decommissioning process.</u> 2-3. <u>These</u> will be the only strategic locations for development on the Severn floodplain: other strategic sites will be targeted elsewhere in the District, in order to minimise flood risk and ensure that the District's future growth is resilient to climate change. Detailed flood risk assessments will be required." Re-number all subsequent Guiding Principles for the Berkeley Cluster accordingly. And add two new criteria: 8: <u>"Adequate and timely infrastructure to tackle wastewater generated by development in agreement with the relevant water companies."</u> 9: <u>"Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan at this location."</u>
MM 072	MOD 34	Paragraph 3.52	Add new bullet point to the <u>Opportunities, growth and key projects</u> for the Berkeley cluster: • <u>"Gloucestershire Science and Technology Park at the former Berkeley Nuclear Power Station site"</u>
MM 073	PSC 054	Paragraph 3.53	<u>Key supporting evidence base</u> for the Berkeley cluster: Add: • <u>"Strategic Flood Risk Assessment (Levels 1 and 2) and Flood Risk Sequential Test (2014)"</u> • <u>"Stroud Infrastructure Delivery Plan (2014)"</u>
MM 074	MOD 35	After paragraph 3.53	Add to the list of <u>Policies</u> that will help to implement the Berkeley vision: <u>"Delivery Policy EI2a Former Berkeley Power Station"</u>

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
MM 075	PSC 055 and PSC 056	Policy SA5	<u>Strategic Allocation Policy SA5: Sharpness Docks:</u> Amend criterion 7 by deleting "to meet the requirements of the Environment Agency". Amend criterion 8 to "<u>Adequate and timely</u> contributions towards improvements to the wastewater and sewerage network <u>in agreement with the relevant Water Companies</u>." Amend criterion 10 by adding "<u>including safe access and egress during flood events</u>." Add new criterion 14 "<u>A sequential approach to site layout and flood risk, with more vulnerable development being located within Flood Zone 1</u>." Insert the following text at the end of the policy: <u>"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."</u>
MM 076	PSC 056	Supporting text to Policy SA5: after 3.55	Insert two new paragraphs to the <u>supporting text for Policy SA5</u>, after paragraph 3.55: <u>"The development must be laid out and designed in order to avoid adverse effects on the Severn Estuary SAC/SPA/Ramsar site. New residential units will be located such that the Sharpness Ship Canal separates them from the SAC/SPA/Ramsar site thus avoiding urban pressures such as fly tipping and cat predation. B Class employment will be located wholly to the south of the Estate to maximise its separation from the SAC/SPA/Ramsar site given the potential of this type of development to result in noise and other disturbance. The 'island site' at the north-west of the estate on which up to 50 dwellings, fixed camping and the hotel and holiday lodges will be situated must be delivered in such a way as to ensure that the hotel is adequately screened from the SPA/Ramsar site and that no direct access is possible onto the foreshore from the island.</u> <u>To demonstrate no adverse effect, planning applications for Sharpness Docks must include</u> <u>A visitor survey of the Severn Estuary SAC/SPA/Ramsar site within the vicinity of Sharpness Docks in order to inform an evaluation of what increase in recreational activity in the SAC/SPA/Ramsar site would result (from the presence of the hotel and campsite in addition to new housing), define management interventions required to ensure no adverse effect and form a basis for future monitoring;</u> <u>A management plan for protecting the natural environment (focussed on the interest features of the</u>

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			<u>SAC/SPA/Ramsar site), particularly with regard to recreational pressure;</u> <u>A non-breeding bird survey of the Sharpness Docks site in order to identify any parts of the site which currently constitute important habitat for the SPA/Ramsar site bird populations and set out any necessary mitigation; A management plan for protecting the natural environment (focussed on the interest features of the SAC/SPA/Ramsar site), particularly with regard to recreational pressure;</u> <u>A non-breeding bird survey of the Sharpness Docks site in order to identify any parts of the site which currently constitute important habitat for the SPA/Ramsar site bird populations and set out any necessary mitigation;</u> <u>An analysis of construction and operational noise within the SAC/SPA/Ramsar site due to the Sharpness Docks development compared to the current noise baseline and details of any mitigation measures (such as seasonal restrictions on some activities, damping of pile-hammers, or use of close-board fencing during construction) that will be deployed to ensure that disturbance of SPA/Ramsar site birds does not occur;</u> <u>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;</u> <u>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.</u> <u>A sediment contamination assessment as part of the marina planning application; and</u> <u>Landscaping to create appropriate visual and noise buffers between the development and the SPA/Ramsar site.</u>
MM 077	PSC 057	Supporting text to Policy SA5: Paragraph 3.56	Amend paragraph to read: "Wastewater and sewerage infrastructure at Sharpness has constraints <u>beyond 2020</u> and the development will be expected to make contributions towards necessary improvements to the networks. <u>The Level 2 SFRA Addendum for Sharpness and the Council's Sequential Test document contain important flood risk advice for developing the site. Key aspects will be ensuring development has safe access and egress in times of flood,</u>

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			<u>locating development outside the floodplain and incorporating space for flood water to reduce flood risk."</u>
MM 078	PSC 058	Policy SA5a	Amend <u>Strategic Allocation Policy SA5a</u> (South of Severn Distribution Park) to: "Land south of Severn Distribution Park (9.8 hectares), as identified on the proposals map, is allocated for B2-B8 employment uses. The development of the site will provide contributions to off-site highway works including public transport, pedestrian and cycle links to Newtown, Berkeley and Dursley, <u>and other infrastructure including flood defences and biodiversity.</u> <u>Development must be located towards the part of the site at lowest risk in the north eastern extent of the site (Flood Zone 1). Wherever possible, identified hazard risk areas should be kept as open space, or the type of development should be compatible with the risk areas. It must also be ensured that safe access to and egress from the site can be achieved for the 1 in 200 year climate change scenario."</u>
MM 079	PSC 059	Supporting text to Policy SA5a: After 3.59	Add new paragraph which states: <u>"The Council will seek opportunities to reduce the overall level of flood risk in the area through the layout and form of the development and financial contributions towards the flood defences and their maintenance where appropriate. Development here will need to comply with habitats regulation assessment recommendations and should include the appropriate application of sustainable drainage systems and create space for flooding to occur by improving flood flow pathways."</u>
Chapter 3: Making Places: Shaping the future of the Severn Vale			
MM 080	PSC 060	Paragraph 3.64	<u>Guiding Principles</u> for the Severn Vale: Add criterion 7: <u>"Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan at this location."</u>
MM 081	PSC 061	Paragraph 3.66	<u>Key supporting evidence base</u> for the Severn Vale: Add: • <u>"Strategic Flood Risk Assessment (Levels 1 and 2) and Flood Risk Sequential Test (2014)"</u> • <u>"Stroud Infrastructure Delivery Plan (2014)"</u>

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
Chapter 3: Making Places: Shaping the future of the Wotton cluster			
MM 082	PSC 062	Paragraph 3.71	<u>Guiding Principles</u> for the Wotton cluster: Add new criterion: "Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan at this location."
Chapter 3: Making Places: Shaping the future of the Cotswold cluster			
MM 083	PSC 063	Paragraph 3.77	<u>Guiding Principles</u> for the Cotswold cluster: Add new criterion: "Address any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan at this location."
Chapter 5: Homes and Communities			
MM 084	PSC 064	SO1 Fig.4 (map)	- Adjust key and re-colour the parishes of Eastington, Stroud, Brimscombe & Thrupp, Minchinhampton to represent revised housing numbers at allocations SA1 and SA2. - Add asterix shape to represent housing allocation SA2 at west of Stonehouse.
MM 085	MOD 36	Policy CP8	Amend Policy CP8, bullet point 6. To read: "Major residential development proposals will be expected to enhance biodiversity on site and, where appropriate, through a network of multi-functional green spaces, which support the natural and ecological processes."
MM 086	MOD 37 as amended	Supporting text to Policy CP9: Paragraphs 4.15 – 4.18	Add to the original Submission Draft supporting text for Core Policy CP9 (paragraphs 4.15 – 4.18) with relevant extracts from MOD 37, as follows: Affordable housing It is important that new residential development meets the identified housing needs in the District. This means providing the right mix of dwelling sizes and tenures, including affordable housing. The Council undertakes

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			Housing Needs Surveys on a five year cycle, alongside Strategic Housing Market Assessments which highlight the need for affordable housing as well as for market housing. Affordable housing is defined as social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. <u>A SHMA update in 2015 identified an overall unadjusted need for affordable housing of 446 dwellings per annum after taking into account the committed supply. In terms of tenure, the SHMA update indicated that the majority of need for affordable housing is for affordable or social rented properties. However, viability evidence indicates that a tenure split of 50% affordable rent and 50% intermediate tenure would be viable for the majority of sites.</u> Affordability is expected to worsen over the next 20 years increasing the impetus for a greater supply of affordable housing within the District. The Council believes that both the very high level of housing need and the limited supply of land for housing justify a low threshold for affordable housing provision. Therefore the Council will require at least 30% of dwellings to be affordable in all housing, including extra care, schemes meeting the size threshold set out in the policy, unless unusually high costs associated with the development of the site, or the realisation of other planning objectives which take priority, make this not viable. <u>Within developments of 11 dwellings or over, other than in exceptional circumstances, affordable housing should be provided on site. This provision should be well integrated with the wider site and indistinguishable by either design or location from the market housing. The Council will also support the buying of land, including through compulsory purchase where necessary, on which affordable homes could be built.</u> <u>Within the Cotswolds Area of Outstanding Natural Beauty sites capable of providing between 6 and 10 dwellings (net) will be required to make a financial contribution equal to the provision of at least 30% affordable housing (where viable) which will be commuted until after completion of the dwellings within the development. The sum will be calculated on the basis of each notional affordable housing unit being valued at 55% open market value of the market units, unless local circumstances justify an alternative amount.</u> Other than in exceptional circumstances, affordable housing should be provided on site. This provision should be well integrated with the wider site and indistinguishable by either design or location from the market housing. The Council will also support the buying of land, including through compulsory purchase where

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			necessary, on which affordable homes could be built. The Council has an affordable housing development programme which aims to provide 150 new affordable council dwellings over the period 2013 to 2018. <u>The Council will prepare a Supplementary Planning Document to provide more detail of how this policy will be implemented.</u>
MM 087	MOD 38 as amended	Policy CP9	Add to the original Submission Draft version of policy CP9: incorporate only the relevant extracts from MOD 38, as follows: Core Policy CP9 Affordable Housing <u>There is an overall unadjusted need for affordable housing of 446 dwellings per annum.</u> Planning permission will be granted for residential (including extra care) development providing an appropriate density that is acceptable in townscape, local environment, character and amenity terms, dwelling types, tenures and sizes seamlessly integrated with existing development or proposed mixed-use development. Affordable housing should broadly reflect the sizes and types that meet the proven needs of people who are not able to compete in the general housing market as well as reflecting the dwelling sizes and design in the proposed development. <u>All residential proposals of at least 11 dwellings (net), and which have a maximum combined gross floorspace of more than 1000sqm (gross internal area), will provide at least 30% of the net units proposed as affordable dwellings, where viable.</u> <u>Within the Cotswolds Area of Outstanding Natural Beauty, as defined on the Policies Map, on sites capable of providing between 6 and 10 dwellings (net), a financial contribution equal to the provision of at least 30% affordable housing will be expected (where viable) and will usually be secured through a s106 agreement or any equivalent future legal mechanism.</u> All residential proposals of at least 4 dwellings (net), or capable of providing 4 dwellings (net) covering a site area of at least 0.16 ha, will provide at least 30% of the net units proposed as affordable dwellings, where viable.

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			On sites capable of providing less than four dwellings (net), a financial contribution to affordable housing of at least 20% of the total development value will be expected (where viable) and will usually be secured through a s106 agreement or any equivalent future legal mechanism. The Council will negotiate the tenure, size and type of affordable units on a site by site basis having regard to housing needs, site specifics and other factors.
MM 088	MOD 39	Supporting text to Policy HC1: Paragraph 4.28	Delete paragraph: An application for a small scaled housing development is defined as: • An application for the creation of fewer than 10 dwellings; or • An outline application for residential development on a site of less than 0.5 hectares.
MM 089	MOD 40	Policy HC3	Amend first sentence of Policy HC3 to read: “At strategic sites allocated within this Local Plan a minimum of 2% of the dwellings shall be to meet Government aspirations to increase self build developments- <u>subject to appropriate demand being identified. In determining the nature and scale of any provision, the Council will have regard to viability considerations and specific site circumstances.</u>”
MM 090	MOD 41	Supporting text to Policy HC3: Paragraph 4.32	Amend paragraph 4.32 to read: “This policy is intended as a mechanism for supporting self-build development in appropriate locations, as sought in national policy. <u>The Council will maintain a local register of self-builders who wish to acquire a suitable plot of land to build their own home to evidence demand.</u> The policy seeks to ensure that a genuinely innovative design approach and a high sustainable construction standard is achieved.”
MM 091	MOD 42	Supporting text to Policy HC4: Paragraph 4.38	Amend paragraph 4.38, last sentence, to read: “...A local Housing Needs Survey <u>produced either by the Parish Council or by a housing provider using a methodology agreed by the District Council</u> provides evidence of the extent and nature of local housing need.”

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
Chapter 5: Economy and Infrastructure			
MM 092	PSC 065	Paragraph 5.4	Amend paragraph 5.4 to delete "potentially" in the last sentence.
MM 093	PSC 066	SO3 Fig.6 (map)	Add pink dot shape to represent new local centre at the strategic allocation SA2, west of Stonehouse, and amend key to make reference to it.
MM 094	PSC 067	Strategic Objective SO4	Amend <u>SO4</u> to: "Strategic Objective SO4: Transport and travel Promoting healthier alternatives to the use of the private car and seeking to reduce CO2 emissions by using new technologies, <u>active travel and/or smarter choices</u>, and encouraging an <u>working towards a more</u> integrated transport system to improve access to local goods and services."
MM 095	PSC 068	Paragraph 5.7	Amend first sentence to "The Local Plan will seek to deliver new and improved transport infrastructure, maximising the use of potential links to rail, other public transport systems and the strategic road network <u>(managed by both the Highways Agency and the Highway Authority)</u> ."
MM 096	PSC 069	SO4 Fig.7 (map)	Add pink dot shape to represent new local centre at the strategic allocation SA2, west of Stonehouse, and amend key to make reference to it.
MM 097	MOD 43 <i>(as amended)</i>	Policy CP11	Amend Policy CP11, second paragraph, second sentence to read: "In general, sites allocated for mixed use redevelopment proposals on existing employment sites should aim to provide for at least the same or an increase in the level of job opportunities as existed when the employment space was previously used, subject to viability and site specific circumstances. above the level last employed on site. and at least to a ratio of 1.2 jobs per residential unit provided on site."
MM 098	PSC 070	Policy CP11	Amend criterion 2 of <u>Policy CP11</u> to: "2. Be readily accessible by public transport, bicycle and foot or contribute towards provision of new sustainable

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			transport infrastructure to serve the area, <u>in order to make the development accessible by those modes.</u> "
MM 099	PSC 071	Policy CP12	<u>Policy CP12:</u> Add "<u>west of Stonehouse (anticipated)</u>" to the list of Local Centres, to reflect new strategic allocation SA2.
MM 100	PSC 072	Supporting text to policy CP13. After paragraph 5.23	Insert new paragraph: <u>"The Highways Agency operates, maintains and improves the strategic road network in England. The Local Highway Authority (LHA) manages and maintains roads within Gloucestershire (outside the strategic road network) and provides public transport and promotes safe and sustainable travel. In addition the Highways Agency and LHA considers, and provides advice, on the impact that development may have on the highway. The Council in cooperation with both the Highways Agency and Local Highway Authority produced Transport Assessments in March & November 2014 to accompany the Local Plan. These reports considered the traffic generation and distribution arising from the developments to determine the ability of the existing highway network to accommodate additional traffic and whether junction mitigation is required. The results of this assessment are important considerations in the policy here."</u>
MM 101	PSC 073	Supporting text to policy CP13. After paragraph 5.23	Insert new paragraph: <u>"There are currently two major gliding clubs within the District; The Cotswold Gliding Club (CGC) based at Aston Down Airfield, and The Bristol and Gloucester Gliding Club (BGGC) based at Nympsfield. In addition there are several hot air balloon and paragliding sites. The Gliding clubs generate 22500 aircraft movements per annum. Ensuring the safety of such aircraft movements is therefore a consideration that can impact on the planning process. The regulation and management of air safety in the United Kingdom is the responsibility of the CAA. In addition gliding is further regulated by the British Gliding Association (BGA). These statutes, regulations and advice prescribe the routes and heights that aircraft can use, both on route to, and in the vicinity of aerodromes. The Council will seek to ensure that any risks between aircraft movements and proposed developments are removed, both for the safety of the general public and aircrew alike. Both the CGC and BGGC have agreed safeguarding areas. The Council will expect planning proposals to address any relevant potential air safety and or aerodrome operation issues in the vicinity of these airfields."</u>

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
MM 102	PSC 074	Policy CP13	Amend first sentence of <u>Policy CP13</u> to: "Proposals for major schemes, <u>as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2010</u> , will be supported where they:"
MM 103	PSC 075	Policy CP13	Add further sentence to last paragraph of <u>Policy CP13</u> : "Development proposals shall be consistent with and contribute to the implementation of the agreed transport strategy, set out in the Gloucestershire Local Transport Plan. <u>Any transport assessment needs will be consistent with the requirements set out in the Gloucestershire Local Transport Plan.</u> "
MM 104	PSC 076	Policy EI1	Delete allocation EK2. (To be replaced by new policy EI2a: see PSC 077 below).
MM 105	MOD 44	Supporting text to Policy EI1: After paragraph 5.28	Add the following to supporting text after paragraph 5.28: " <u>The southern part of the Key Employment Site at Javelin Park (Site Reference EK14) is allocated as a strategic waste site in the adopted Gloucestershire Waste Core Strategy under the provisions of Core Policy WCS6, and is suitable for such purposes. Delivery of Policy EI1 does not preclude this proposed use from coming forward on the southern part of the site in accordance with the provisions of Core Policy WCS6.</u> "
MM 106	MOD 45 <i>(as amended)</i>	Policy EI2	Amend Policy EI2, first paragraph, to read: "Regeneration of existing employment land listed below will be permitted for mixed use development, including employment-generating uses, provided there are demonstrable environmental and/or conservation benefits and s Site rationalisation leads to investment that provides greater <u>should aim to provide at least the same</u> employment opportunities for the local community <u>as existed when the employment space was previously used, subject to viability and site specific circumstances.</u> "
MM 107	MOD 46	Supporting text to policy EI2: Paragraph 5.31	Amend paragraph 5.31, second sentence, to read: "...The development should <u>aim to</u> provide at least the same employment opportunities as existed when the employment space was previously used, <u>subject to viability and site specific considerations.</u> "

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
MM 108	PSC 077 and MOD 47	New Policy EI2a	New policy and supporting text: <u>Policy EI2a: The Berkeley Centre Former Berkeley Power Station:</u> "The site will be retained for B1-B8 employment uses and for employment related training and education purposes and for operations and uses associated with the decommissioning of the nuclear power station. Redevelopment for unrelated alternative uses will not be permitted."
MM 109	PSC 078 and MOD 48	Supporting text to new Policy EI2a:	Insert supporting text after new Policy EI2a, to read as follows: "The former Berkeley Power Station site includes de-licensed office and laboratory accommodation currently providing employment accommodation in a rural location by the River Severn. A major project to develop the site to develop a GREEN Skills Centre to provide a training centre for STEM skills related to the renewable energy, engineering and nuclear sectors to create the Gloucestershire Science and Technology Park (which will include a range of educational, training and research facilities related to the renewable energy, engineering, digital technologies, advanced manufacturing and nuclear sectors) has been promoted by the GFirst LEP. Proposals for continued B1-B8 uses on the site or that develop the Skills Centre and education uses and ancillary uses, or those associated with the decommissioning process, or those associated with the Science and Technology Park (including forms of renewable and low carbon energy generation) will be supported. Alternative uses will not be permitted in this rural location."
MM 110	PSC 079	Policy EI4	Amend <u>Policy EI4</u> , criterion 3 by adding " <u>or locality</u> " at the end, to comply with the supporting text contained in Paragraph 5.34.
MM 111	PSC 080	Policy EI9	<u>Policy EI9:</u> Add " <u>west of Stonehouse (anticipated)</u> " to the list of Local Centres, to reflect new strategic allocation SA2.
MM 112	PSC 081	Policy EI11	Add criteria to <u>Policy EI11</u> , which states: " <u>it is not subject to any other over-riding environmental or other material planning constraints.</u> "
MM 113	PSC 082 and	Policy EI12	Amend <u>Policy EI12:</u> Add to <i>Enhancing Accessibility</i> paragraph as follows:

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
	MOD 49		Amend first sentence to read: “<u>All development proposals should have full regard to the traffic impact on the local highway network.</u>” Amend second sentence to read: “Major development proposals, or those that are likely to have a significant impact on the local transport network, will be required to submit <u>a Transport Assessment as well as</u> a Travel Plan, to demonstrate that they have fully considered access by all modes of transport.” Add to <i>Parking Standards</i> paragraph as follows: “Vehicular parking standards for new development should be provided in accordance with adopted standards, <u>as set out in Appendix 2 of this Local Plan, or where the developer can adequately justify their own parking provision with accompanying evidence with any planning application. This will need to demonstrate that the level would not have a detrimental impact on the local road network.</u>”
MM 114	MOD 50	Supporting text to Policy EI12: After paragraph 5.63	Add new paragraph after paragraph 5.63 to read: <u>“Where a developer seeks to justify a departure from the adopted parking standards any assessment should take into account the individual merits of the development and the following:</u> <u>the accessibility of the development;</u> <u>the type, mix and use of development;</u> <u>the availability of and opportunities for public transport;</u> <u>local car ownership levels; and</u> <u>an overall need to reduce the use of high-emission vehicles.</u> <u>as well as the capacity of the local road network to accommodate any displaced demand.”</u>
Chapter 6: Our environment and surroundings			
MM 115	PSC 083 and PSC 084	Paragraph 2.5 Strategic Objective SO5	Add to <u>SO5</u> bullet criteria: <u>Strategic Objective SO5: Climate Change and environmental limits</u> Promoting a development strategy that mitigates global warming, adapts to climate change and respects our environmental limits by:

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			• Securing energy efficiency through building design • Maximising the re-use of buildings and recycling of building materials • Minimising the amount of waste produced and seeking to recover energy • Promoting the use of appropriately located brownfield land • <u>Supporting a pattern of development that facilitates the use of sustainable modes of transport</u> • Minimising and mitigating against future flood risks, and recycling water resources and <u>protecting and enhancing the quality of the District's surface and groundwater resources</u>
MM 116	PSC 085	SO5 Fig.8 (map)	• Amend 'key areas of growth' shape to the west of Stonehouse, to represent the full extent of revised strategic allocation SA2.
MM 117	PSC 086	Policy CP15	Amend <u>Core Policy CP15</u> to read as follows: "In order to protect the separate identity of settlements and the quality of the countryside (including its built and natural heritage), proposals outside identified settlement development limits will not be permitted except where <u>these principles are complied with</u>: 1. It is essential to the maintenance or enhancement of a sustainable farming or forestry enterprise within the District; and/or 2. It is essential to be located there in order to promote public enjoyment of the countryside and support the rural economy through employment, sport, leisure and tourism; and <u>/or</u> 3. In the case of <u>It is a</u> 'rural exception sites', <u>where</u> development is appropriate, sustainable, affordable and meets an identified local need; <u>and/or</u> 4. <u>It is demonstrated that the proposal is enabling development to maintain a heritage asset of acknowledged importance.</u> <u>Where development accords with any of the four principles listed above, development will only be permitted in the countryside if:</u>

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			i. It does not have an adverse impact on heritage assets and their setting; and ii. It does not lead to excessive encroachment or expansion of development away from the original buildings; and iii. It is contained within appropriately located buildings which <u>It proposes to re-use an existing building or buildings, where these</u> are appropriately located and are capable and worthy of conversion. Any such conversion will involve a building that positively contributes to an established local character and sense of place. In the case of replacement buildings they must bring about environmental improvement; or iv. In the case of extensions to buildings it does not result in inappropriate increases in the scale, form or footprint of the original building; or v. In the case of replacement dwellings the proposal must: B<u>bring</u> about environmental improvements; and N<u>ot</u> result in inappropriate increases in the bulk, scale, form or footprint of the original building; or vi. In the case of <u>new buildings for</u> essential community facilities, they cannot be accommodated within the identified settlement development limits or through the re-use/replacement of an existing building."
MM 118	PSC 087 and MOD 51	Policy ES1	Replace <u>Delivery Policy ES1</u> Sustainable Construction and Energy Efficiency with: <u>"Delivery Policy ES1 - Sustainable Construction and Design</u> <u>Sustainable design and construction will be integral to new development in Stroud District. All planning applications should include evidence that the standards<u>matters</u> below will be addressed:</u> <u>1. Maximising energy efficiency and integrating the use of renewable and low carbon energy (i.e. in the form of an energy strategy);</u> <u>2. Minimisation of waste and maximising of recycling of any waste generated during construction and in operation;</u> <u>3. Conserving water resources and minimising vulnerability to flooding;</u> <u>4. Efficiency in materials use, including the type, life cycle and source of materials to be used;</u> <u>5. Flexibility and adaptability, allowing future modification of use or layout, facilitating future refurbishment and retrofitting;</u>

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			6. Consideration of climate change adaptation. 7. Applications for all development will need to be accompanied by a Stroud District Sustainable Construction Checklist and shall be implemented to meet the agreed targets therein. All development will be built in accordance with the approved plans and the Sustainable Construction Checklist."
MM 119	PSC 088 and MOD 52 <i>(as amended)</i>	Supporting text to Policy ES1: paragraphs 6.13 - 6.18	Delete paragraphs 6.13 - 6.18 inclusive. Replace with the following text, to support revised Policy ES1: <u>"The UK Government has set a timetable for tightening carbon standards in building regulations to achieve zero carbon residential buildings by 2016 and it is the intention for non-residential buildings to be zero carbon by 2019. The Council will aim to produce an SPD in accordance with any targets or standards at that time. The UK Government is seeking to meet the UK's climate change commitments cost-effectively, including promoting innovation to make a cost-effective transition to a low carbon economy. As part of its strategy, the Government is keeping energy efficiency standards under review, recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become more established. Policy ES1 supports making sustainable construction and design integral to new developments in Stroud District to assist with a cost effective transition to a low carbon economy. The purpose of the checklist is to highlight sustainable construction matters that developers can consider. It is not intended to duplicate the elements of sustainable construction that are incorporated into the building regulations. It will demonstrate to the Council enable the Council to assess which sustainable construction principles have been considered in development proposals for new build and/or refurbishment of existing buildings but does not seek to prescribe a set standard or requirement. The Council encourages a holistic approach where sustainable construction considerations are taken fully into account from initial project thinking through to development completion. This approach should achieve high quality sustainable development which is responsive to people's needs and can help avoid unnecessary project delay."</u>
MM 120	MOD 53	Policy ES2	Amend Policy ES2 first paragraph to read: "The Council will support proposals that maximise the generation of energy from renewable or low carbon sources, provided that the installation would not have significant adverse impact <u>(either alone or cumulatively)</u>

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			and includes an impact statement that demonstrates the following factors:”
MM 121	MOD 54	Policy ES2	Add a new criterion 5, to read: <u>“5. Avoid the use of high-quality best and most versatile agricultural land, unless justified by clear and compelling evidence.”</u>
MM 122	MOD 55	Supporting text to Policy ES2: paragraph 6.23	“The Council will encourage low or zero-carbon energy generating projects that contribute positively to the aim of reducing CO2 emissions and to national targets for renewable electricity generation, provided that they meet the criteria set out in Policy ES2: Renewable or Low Carbon Energy Generation. <u>In the case of wind energy development, the planning impacts identified by affected local communities should be fully addressed to ensure that the proposal has their backing.</u> ”
MM 123	PSC 089 and MOD 56	Supporting text to Policy ES2: paragraph 6.24	“Developers will be required to provide information on the <u>justification for and</u> likely impact of proposals, including: • <u>the appropriateness of the location for the specific technology involved and what reasonable alternatives have been considered;</u> • <u>the nature and extent of early engagement with local communities and how this engagement has informed the evolution of the proposal;</u> • <u>local amenity implications and how an acceptable living environment will be maintained;</u> • information on noise and emissions generation; • a visual impact assessment incorporating an analysis of landscape character and the relationship to any significant heritage asset; and • appropriate ecological surveys, following the most recent national guidance and best practice; <u>and</u> • <u>in the case of hydropower schemes, a Water Framework Directive Compliance Assessment and evidence of discussions with the Environment Agency on requirements of the Environmental Permitting Regulations.</u>”

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
MM 124	PSC 090 and MOD 57 MOD 58	Policy ES4	Amend paragraph three of <u>Policy ES4</u> to read as follows: “New major developments, or those in areas of flood risk (zones 2 and 3), will be required to <u>shall</u> incorporate Sustainable Drainage Measures (SuDs) <u>in accordance with National Standards for Sustainable Drainage Systems...</u>” Amend criterion 4 to: <u>“Discharge surface run-off, not collected for use, to one or more of the following, listed in order of priority:</u> <u>a. discharge into the ground (infiltration); or where not reasonably practicable,</u> <u>b. discharge to a surface water body; or where not reasonably practicable,</u> <u>c. discharge to a surface water sewer, highway drain, or another drainage system; or where not reasonably practicable,</u> <u>d. discharge to a combined sewer”</u> Add new criterion 6 to read: <u>“6. Connect to the main foul sewer network where possible.”</u>
MM 125	PSC 091 and MOD 59	Supporting text to Policy ES4: Paragraph 6.34	Further to PSC 091, revert to original Submission Draft text, as follows: “This is not a comprehensive list and applicants for major developments of ten or more dwellings, or those in areas of flood risk, should identify the most appropriate scheme, or combination of schemes, to suit the proposed development ...”
MM 126	MOD 60	Supporting text to Policy ES4: Paragraph 6.35	Modify the supporting text for Policy ES4, at paragraph 6.35: “Consultation and discussion should take place with the Lead Local Flood Authorities (LLFA) <u>which is the County Council</u> in relation to assessing SuDs, and the pending SUDS Approval Bodies (SABs). <u>Such discussions should focus upon the run-off destination hierarchy set out in the National Standards for Sustainable Drainage Systems.</u>”
MM	PSC 092	Policy ES6	Amend wording of <u>Policy ES6</u> :

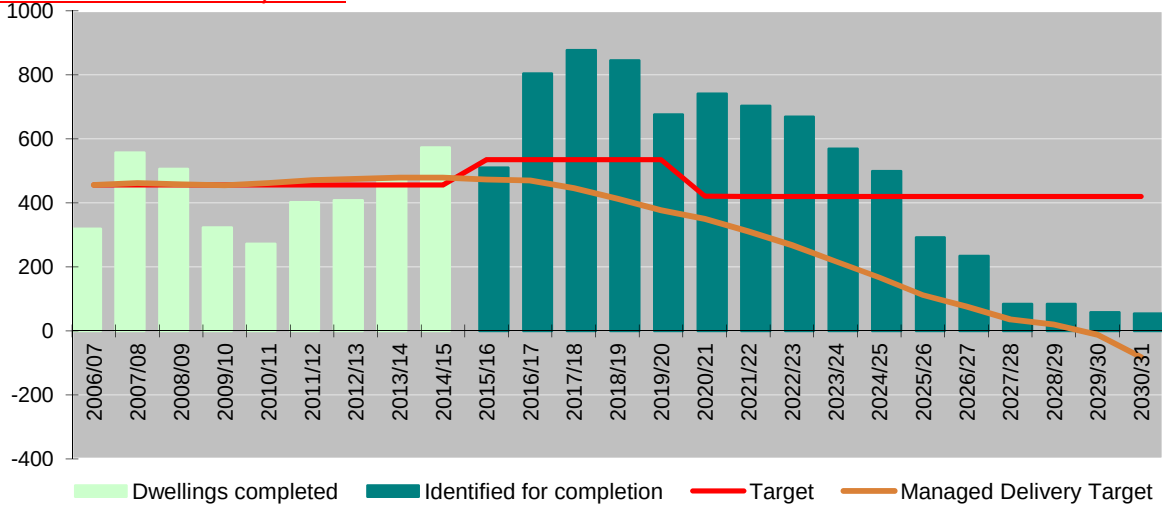
Change number	Consultation ref.	Paragraph / Policy	Proposed Change
127			Alter RAMSAR in first sentence to "<u>Ramsar</u>". Add to <i>European Sites</i> Paragraph: <u>"The Council will expect development proposals to demonstrate and contribute to appropriate mitigation and management measures to maintain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

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			at the District scale.”
MM 128	PSC 093	Supporting text to Policy ES6: After Paragraph 6.45	Additional wording after paragraph 6.45: <u>"The Council will work with neighbouring Severn Estuary authorities to monitor visitor activities and potential disturbance in the Severn Estuary SPA, which may have implications for future environmental management strategies. There is considerable existing evidence and guidance available that is likely to be relevant to green infrastructure planning, including the Gloucestershire Nature Map developed by the Gloucestershire Biodiversity Partnership, the Rights of Way Improvement Plan, town/landscape assessments, and Historic Environment Records. Work currently being undertaken is likely to identify a core recreational catchment zone around the Severn Estuary SAC/SPA/Ramsar site in which development proposals that involve a net increase in housing may be required to contribute to the funding of mitigation measures. Due to its scale and relative proximity to the SPA/SAC/Ramsar site the West of Stonehouse development has been specifically identified as requiring application-level HRA, although it should be possible to provide avoidance and mitigation measures."</u>
MM 129	PSC 094	Supporting text to Policy ES6: After Paragraph 6.45	Add new paragraph: <u>"The HRA of the Local Plan and discussion with Natural England and The National Trust have identified measures that will be required on Rodborough Common over the Local Plan period to ensure no adverse effect occurs on the SAC due to the expected population increase within the Stroud Valleys area and associated increase in recreational activity. A consistent 3km core catchment zone has been defined around this SAC to reflect the current patterns of activity based on settlements. The identified Rodborough SAC impacts result from the proposed growth over the Plan period. In this context a small number of visitors from a particular settlement for example will still make an overall contribution to the identified impacts in the HRA. Development proposals within this core catchment zone will be required to contribute to mitigation measures. The Council commits to working with partners to deliver improvements to Rodborough Common SAC through the delivery of measures including installation of new cattle grids, better dog management measures (on site), alternative dog walking opportunities (off site) grassland restoration on the lower slopes and maintenance of parking areas in order to avoid an adverse effect on the integrity of the SAC associated with increased recreational activity over the plan period. The initiatives will be funded through CIL and S106 contributions that contribute towards a SAC Avoidance and Mitigation Strategy. This will identify measures that can include the potential to enhance</u>

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			<u>open space(s) to deflect visits away from the SAC. A Supplementary Planning Document (SPD) will be prepared to provide clarity for developers. Where instead of a bespoke solution, provision is made for contributions to be paid and pooled towards implementing the Avoidance and Mitigation Strategy upon which Natural England has been consulted), the District Council will not require an Appropriate Assessment of the planning application. The SPD will be subject to regular monitoring and review to at least coincide with the Local Plan Review."</u>
MM 130	PSC 095	Supporting text to Policy ES6: After Paragraph 6.45	Add new paragraph: " <u>Where a development includes specific measures to avoid and mitigate its impact upon the SAC and/or SPA, the District Council will in consultation with Natural England, undertake an Appropriate Assessment. This will consider the effect of the proposal on the SAC or SPA and the avoidance and mitigation measures, including size and location of any proposed semi-natural open space.</u> "
MM 131	PSC 096	Policy ES10	Amend points 2(A), 3 and 4 of <u>Policy ES10</u> as follows: "2. A. the 68 sites of Archaeological nationally important <u>national archaeological importance (which are designated as Ancient Monuments)</u> , <u>any undesignated archaeology of national significance</u> , and the many buildings that are Listed as having special architectural or historic interest" "3. Proposals will be supported which preserve or <u>protect and, where appropriate,</u> enhance the heritage significance and setting of locally identified heritage assets, such as buildings of local architectural or historic interest, locally important archaeological sites and parks and gardens of local interest." "4. Proposals will be supported which preserve or <u>protect and, where appropriate,</u> enhance key views and vistas, especially of the spires and towers of historic churches and mills."
MM 132	PSC 097	Supporting text to Policy ES10: Paragraph 6.58	Amend Paragraph 6.58, breaking it into two paragraphs and adding new text towards the end of the first paragraph, as follows: "Stroud District has an important legacy of heritage and cultural assets, including over 4,500 listed buildings, 42 conservation areas, 14 registered historic parks and gardens and 68 scheduled monuments. There are a wide range of undesignated historic buildings, archaeological sites and remains, and historic parks and gardens, as well as places, areas and landscapes of historic interest. Information about heritage assets can be found in the

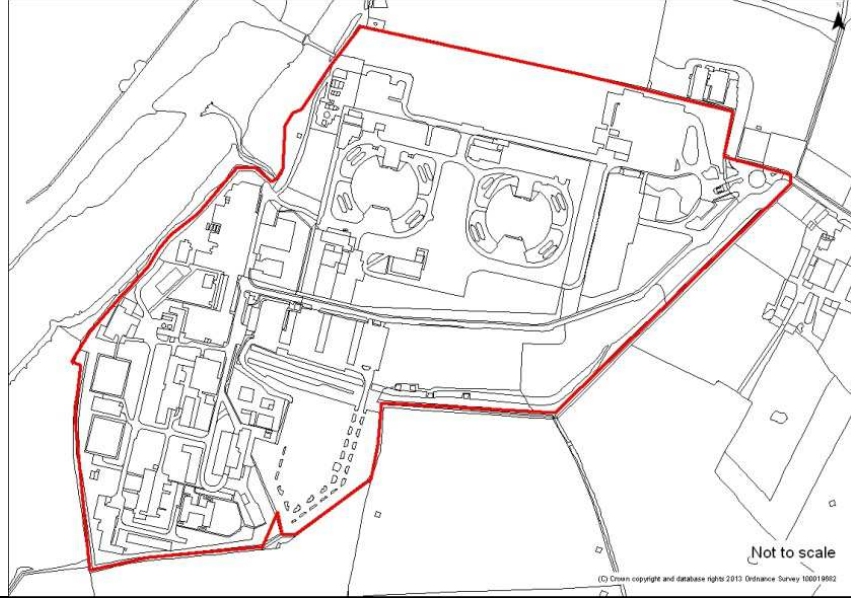
Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			Gloucestershire Historic Environment Record (HER). These assets make a significant contribution to the identity of the locality in which they are set, helping to create a sense of place. <u>The Council is committed to protecting and enhancing the District's historic environment and will produce a heritage strategy to supplement the Local Plan. The strategy will positively address the issues and pressures that are facing our heritage assets, including those identified in Chapter 1 of this Plan, and it will set out a programme for the appraisal and management of our conservation areas and the monitoring of any heritage assets 'at risk'.</u> Applications for development which affect heritage assets and their settings directly or indirectly will need to describe the nature of the significance of the assets affected, and set out how development will maintain and enhance heritage assets and their settings in a manner appropriate to that significance. New development should seek opportunities to draw on the historic environment in order to maintain and enhance local character and distinctiveness."
MM 133	PSC 098	Supporting text to Policy ES10: Paragraph 6.60	Amend Paragraph 6.60 to read: <u>"Development proposals that involve any harm to or loss of a heritage asset would require clear and convincing justification, in accordance with the NPPF.</u> A development proposal will not be permitted where substantial harm to an existing or potential heritage asset is likely to occur, unless there are substantial public benefits."
MM 134	PSC 099	Supporting text to Policy ES14: After 6.70	Add new paragraph: <u>"Green Infrastructure (GI) provision is being discussed between all Gloucestershire district & county councils with the aim of providing a district wide Strategic Framework for GI requirements. The Council will consider the requirements for GI, in line with the emerging GI Framework, when determining planning applications."</u>

Change number	Consultation ref.	Paragraph / Policy	Proposed Change					
Chapter 7: Delivery and monitoring								
MM 135	MOD 61 (NOTE: this change entirely supersedes PSC 100).	Paragraph 7.6	Update table showing housing supply and delivery (2006-2031) and add housing trajectory, reflecting the revised Local Plan housing requirement:					
			Source of housing supply	2006 to 2013 2015	Projected Delivery of Allocations 2013 2015 - 2031			Total supply
					1-5 years	6-10 years	11-15+ years	
			Completions	2,787 3,837				2,787 3,837
			Commitments (2013 2015)					4,304 3,948
			<u>Undeliverable permissions (2015)</u>					-449
			Stroud Valleys		130 170	100 260	70 20	300 450
			<u>West of Stonehouse</u>		350	850	150	1,350
			North East Cam		300 180	150 270		450
			Hunts Grove Extension		132	140 579	360 39	500 750
			Sharpness Docks North		45 80	125 116	130 104	300
			Small sites windfall		250 115	250 290	250 345	750
			Council Housing Programme		150 109	0 41	0	150
			District Total	2,787 3,837	875 1136	765 2406	810 658	9,541 11,536

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			<u>“The following graph sets out how the total housing supply is anticipated to be delivered by 2031. As houses are completed, the managed delivery target reduces to the point that the minimum housing requirement is expected to be achieved by 2029.”</u>  Legend: Dwellings completed (light green), Identified for completion (dark teal), Target (red line), Managed Delivery Target (orange line).
Chapter 8: Appendices and maps			
MM 136	PSC 101	Appendix 1	<u>Appendix 1: Monitoring Framework: table of targets and indicators</u> Insert target of ES10 to read "The completion of a Heritage Strategy" Amend ES10 indicators to read: • Number of listed buildings • Number of heritage assets at risk • Number of non-designated heritage assets (these can be, but are not always, "locally listed") • Number of conservation areas with an up to date appraisal and heritage at risk survey

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
			Number of incidences of substantial harm to non designated heritage assets.
MM 137	PSC 102	Appendix 4 Glossary	Add: "Design and Access Statements - A design and access (DAS) statement is a report accompanying and supporting a planning application. They provide a framework for applicants to explain how a proposed development is a suitable response to the site and its setting, and demonstrate that it can be adequately accessed by prospective users. The access component of the DAS relates to access to the development and does not extend to the internal treatment of individual buildings. It needs to cover both vehicular and transport links and inclusive access. The statement should provide information on consultations carried out such as with community groups or technical specialists including highway engineers or urban designers. The DAS must explain relationships with the existing highway network including paths."
MM 138	PSC 103	Appendix 4 Glossary	Add: "Heritage Asset - A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing)."
MM 139	PSC 104	Appendix 4 Glossary	Add: "Historic Environment - All aspects of the environment that result from the interaction between people and places through time, including surviving physical remains of past human activity, whether visible, buried or submerged, and landscape and planted or managed flora.
MM 140	PSC 105	Appendix 4 Glossary	Add: "Strategic Road Network - The major road network is defined by the Department for Transport as the network of motorways, trunk roads and principal roads that serve the country's strategic transport needs. Motorways and trunk roads (nationally significant A-roads) managed by the Highways Agency make up approximately 20% of the national major road network. The remaining 80% of the major road network consists of principal roads—other A-roads managed by local authorities. For the purposes of this Local Plan we have accepted this definition which includes both major and principal roads."

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
MM 141	PSC 106	Appendix 4 Glossary	Add: "Transport Assessment - A Transport Assessment is a comprehensive review of all the potential transport impacts of a proposed development or re-development, with an agreed plan to mitigate any adverse consequences. The purpose of Transport Assessment is to provide enough information to understand how the proposed development is likely to function in transport terms. Assessing the transport impacts in a systematic manner contributes towards understanding how more sustainable travel patterns might be achieved through changing travel behaviour. The preparation and detail of a Transport Assessment will vary depending on the location, scale and nature of the proposed development. Transport Assessment should, where appropriate, propose a package of measures designed to promote access to the site by walking, cycling and public transport, while reducing the role of car access as much as possible."
MM 142	PSC 107	Appendix 4 Glossary	Replace definition of 'Travel Plan' as follows:: "Travel Plan - All developments which generate significant amounts of movement should be required to provide a Travel Plan. A Travel Plan is a strategy for managing multi-modal access to a site or development, focusing on promoting access by sustainable modes. The main objective of a travel plan is to reduce the number of single occupant car trips to a site. A successful travel plan will give anyone travelling to or from a business or organisation a choice of travel options and encourage them to use the more sustainable ones. Travel plans can be used to ensure that infrastructure and transport services (e.g. buses/minibuses) are provided as part of a development to ensure that the travel requirements of occupiers and visitors to a development can be met. Effective travel plans will include measures to restrain and manage parking on the site. The travel plan will include a set of agreed targets for the percentage of journeys to the site by car driver alone and details of action to be taken if the travel plan fails to achieve its aims and objectives. Travel plans benefit the community by helping to reduce traffic congestion and pollution for local residents. They can be used to help identify problems that are occurring (e.g. commuter parking taking place on residential streets) and include measures to address such problems. They benefit organisations by reducing the space that has to be allocated on site to car parking, encouraging more healthy travel options for the workforce, widening the range of travel options available to the site and improving access to the site for a wider range of users."

Change number	Consultation ref.	Paragraph / Policy	Proposed Change
The policies map:			
MM 143	PSC 108	Policies Map SA2	Delete strategic allocation SA2 North of Stroudwater Industrial Estate and replace with a new shape showing SA2 West of Stonehouse.
MM 144	PSC 109	Policies Map Local centre	Add new shape to show a local service centre at the site of SA2 West of Stonehouse.
MM 145	PSC 110 and MOD 63	Policies Map EK2 / EI2a	Delete shape showing key employment allocation EK2 Former Berkeley Power Station. Replace with new shape showing allocation EI2a Former Berkeley Power Station: 
MM 146	MOD 62	Polices Map: Site Allocation SA4	Delete outline showing SA4 and replace with new shape showing revised site boundary, to include a further area of land to be allocated as part of the Hunts Grove Extension.

Report to Charnwood Borough Council

by Kevin Ward BA (Hons) MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 21st September 2015

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO THE CHARNWOOD LOCAL PLAN:
CORE STRATEGY

Document submitted for examination on 20 December 2013

Examination hearings held on 19 and 20 March 2014 and between 9 December 2014 and 16 January 2015

File Ref: PINS/X2410/429/11

Abbreviations used in this report

AA	Appropriate Assessment
DCLG	Department for Communities and Local Government
HMA	Housing Market Area
HRP	Housing Requirements Project
HRS	Housing Requirements Study
LDS	Local Development Scheme
MM	Main Modification
NPPF	National Planning Policy Framework
OAN	Objectively assessed need for housing
PPG	Planning Practice Guidance
PUA	Principal Urban Area
SA	Sustainability Appraisal
SA and DM DPD	Site Allocations and Development Management Development Plan Document
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SUE	Sustainable Urban Extension

Non-Technical Summary

This report concludes that the Charnwood Local Plan: Core Strategy provides an appropriate basis for the planning of the Borough subject to a number of modifications being made. The Council has specifically requested me to recommend any modifications necessary to enable the plan to be adopted.

The Council has provided the detailed wording for the modifications, many of which are based on suggestions it put forward during the examination. I have recommended their inclusion after considering the representations from other parties on these issues.

The main modifications can be summarised as follows:

- Increase the annual average housing provision to 820 homes, amend the time period for housing provision to 2011-2028 and clarify that this provision is to be regarded as a minimum;
- Clarify the approach to sources of employment land and the contribution of strategic locations and ensure that the approach to the scale of housing and jobs growth is broadly aligned;
- Ensure that the figures for the distribution of housing provision reflect the overall Borough provision of 820 homes per year, cover the period 2011-2028 and take account of the extent of completions and commitments in Service Centres and other settlements.
- Include a realistic housing trajectory which reflects up to date evidence;
- Delete the Direction of Growth at Shepshed in light of the significant number of commitments that are now in place;
- Set out a clear and effective monitoring framework;
- Include a list of policies in the Borough of Charnwood Local Plan which will be superseded by policies in the Core Strategy; and
- Amend the wording of a number of policies to ensure that they are effective by providing necessary clarity and/or flexibility, that they are justified by up to date evidence and are consistent with national policy.

Introduction

1. This report contains my assessment of the Charnwood Local Plan: Core Strategy (the Core Strategy) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Council has complied with the duty to co-operate in relation to the preparation of the Core Strategy, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Core Strategy is sound and whether it is compliant with the legal requirements. Paragraph 182 of the National Planning Policy Framework (NPPF) makes it clear that to be sound a local plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. Prior to submission, the Council produced a schedule of minor changes (TP/3). The basis for my examination is the submitted Core Strategy which is the same as the Pre-Submission Draft of June 2013 incorporating the schedule of minor changes.
3. In accordance with section 20(7C) of the 2004 Act, the Council requested that I recommend any modifications needed to rectify matters that make the Core Strategy unsound/not legally compliant and thus incapable of being adopted. This report deals with the main modifications that are needed to make the Core Strategy sound and legally compliant and they are identified in bold in the report (MM). These main modifications are set out in the Appendix.
4. The main modifications relate to matters that were discussed at the examination hearings. The Council has provided the detailed wording of the main modifications, many of which are based on suggestions it put forward during the examination.
5. The main modifications have been subject to public consultation and Sustainability Appraisal (SA) and I have taken account of consultation responses and the findings of the SA in writing this report. The Written Ministerial Statement on Local Planning (HCWS42) was published on 18 June 2015, after the consultation period on the schedule of proposed main modifications had ended. This sets out revised national policy on wind energy development. A further main modification is required to ensure that Policy CS16 of the Core Strategy is consistent with this revised national policy. This further main modification has been subject to SA and consultation, which I have taken into account prior to finalising my report.
6. The proposed main modification to Policy CS3 published for consultation included an amended approach to the site size thresholds for seeking affordable housing provision. This was based on the Written Ministerial Statement on the subject published shortly before the further hearing sessions. In the light of the High Court judgement issued on 31 July 2015 (West Berkshire District Council and Reading Borough Council v SSCLG [2015] EWHC 2222 (Admin)) this aspect of the main modification is no longer required to ensure consistency with national policy and it has been amended accordingly. Given that I consider that the policy should remain as set out in the submitted plan in this specific respect, there was no need for further consultation.

7. Early in the examination I identified significant issues in relation to the duty to co-operate and soundness in terms of overall provision for housing. I held initial hearings on these matters in March 2014. Following these initial hearings I confirmed that whilst I was satisfied that the Council had complied with the duty to co-operate, the Core Strategy as submitted was not sound due to the lack of an up to date and robust assessment of housing needs within the Leicester and Leicestershire Housing Market Area (the HMA) and no clear basis to determine how such needs would be met. Given that work on an up to date joint Strategic Housing Market Assessment (the 2014 SHMA) was well underway I agreed to suspend the examination to allow this to be completed, further work to be undertaken on the capacity to accommodate housing within each of the relevant authorities¹ and discussions to take place between the authorities in relation to accommodating identified housing needs. This work was completed and a Memorandum of Understanding was agreed by all of the authorities in the HMA. In the light of this, the hearings for the examination resumed in December 2014.
8. Following the close of the hearings, the Government published the 2012-based Household Projections on 27 February 2015. The Council and others were given the opportunity to comment on the implications for the Core Strategy and I have taken account of these comments.

Assessment of Duty to Co-operate

9. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the preparation of the Core Strategy.
10. In terms of cross boundary issues, the overall provision for housing is of particular significance given patterns of commuting and migration, interrelationships in housing markets and the role that the Borough has had in accommodating growth on a sub-regional level. The Council, along with the other Leicester and Leicestershire authorities, has long acknowledged that Charnwood forms part of the wider HMA.
11. The Council has demonstrated a history of co-operation and joint working with the other authorities in the HMA in relation to strategic housing matters. There have been clear and ongoing mechanisms for co-operation between authorities at both member and officer level.
12. I am satisfied that during the preparation of the Core Strategy, the Council showed a continued willingness to plan positively for the housing needs of the wider HMA and specifically to address issues relating to the Principal Urban Area of Leicester (the PUA). I am also satisfied that this was the Council's intention in continuing to plan for the level of annual housing growth set out in the now revoked East Midlands Regional Plan (the Regional Plan).

¹ Charnwood, Leicester City, Blaby, Harborough, Hinckley and Bosworth, Melton, North West Leicestershire and Oadby and Wigston

13. The Council's ongoing positive approach to co-operation and collaboration is illustrated by the fact that in June 2013 it joined with the other authorities in the HMA to commission a new SHMA.
14. I deal below with the soundness issues in relation to identifying and meeting housing needs across the HMA. However, in terms of the duty to co-operate there is no specific requirement to have produced joint evidence on housing needs or to have reached agreement on the distribution of housing provision across the HMA at the time of submission. It is the actions of the Council in terms of co-operating with other relevant authorities which is critical to my consideration of the matter. I have also taken account of the representations made by these other authorities.
15. Although North West Leicestershire District Council had raised concern over the justification for the level of housing provision in the Pre-Submission Draft Core Strategy, this representation was subsequently withdrawn. Therefore, none of the authorities in the HMA have concerns over the level of housing provision in the Core Strategy and none have questioned the Council's compliance with the duty to co-operate.
16. Whilst it is regrettable that the work on the 2014 SHMA was not completed before the Core Strategy was submitted, I appreciate the Council's motivation for seeking to have a plan in place as soon as possible.
17. Other authorities and prescribed organisations were involved at key stages in the preparation of the Core Strategy and there are a number of examples of cross boundary joint working on other issues such as employment land requirements, Green Infrastructure and Gypsy and Traveller accommodation needs.
18. Taking all of the above factors into account and within the specific context which applies in this case, I am satisfied that the Council engaged constructively, actively and on an ongoing basis in terms of overall housing provision and indeed other strategic matters. I conclude therefore that the Council has complied with the duty to co-operate.

Assessment of Soundness

Main Issues

19. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified the following main issues upon which the soundness of the Core Strategy depends.

Issue 1 – Whether the Core Strategy has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the overall provision for housing

20. There is a considerable degree of consensus that Charnwood forms part of the wider Leicester and Leicestershire HMA and I am satisfied that evidence set out in the 2014 SHMA and previous studies supports this view.
21. Given this, and the national policy context provided by the NPPF, it is clearly necessary for me to consider and indeed report upon evidence concerning housing needs and the ability to meet them in the wider HMA. It would not be possible to reach conclusions on the soundness of the Core Strategy in terms of overall housing provision without first considering the housing needs of the HMA and whether there will be unmet needs from other authorities. Having said that, it must be emphasised that this examination only concerned the Core Strategy for Charnwood. References to other authorities are made within this context and Local Plans in these other areas, along with the evidence base for them, will need to be examined independently in due course. Nothing in my report should be considered to pre-determine the outcome of future examinations elsewhere.
22. The submitted Core Strategy sought to provide for 790 homes per year in the Borough between 2006 and 2028 (17,380 in total). This was essentially based on the level of annual housing growth for Charnwood set out in the now revoked Regional Plan, which in turn was derived from 2004-based household projections, adjusted to take account of the strategy of urban concentration and regeneration. A joint Leicester and Leicestershire SHMA was produced in 2008; however this focussed on the type of housing required and affordable housing and did not address overall housing needs.
23. The 2011 Leicester and Leicestershire Housing Requirements Project (HRP) report took account of 2008-based household projections and identified a range of scenarios for housing requirements for the HMA and the individual authorities. However, the figure of 790 homes per year for Charnwood was not identified as one of the specific scenarios. The HRP was published before key data from the 2011 Census was available and before updated population and household projections. It did not reach specific conclusions on levels of housing provision and it was not followed up by discussions and agreements between the authorities regarding the distribution of housing growth.
24. The Charnwood Housing Requirements Study (HRS) was published in October 2013. I have detailed concerns over the methodology and assumptions used in the HRS. More fundamentally however, it only considered the housing needs of Charnwood and not the wider HMA.
25. Therefore, at the time of submission, there was not an up to date and robust

assessment of housing needs in the HMA. It was not clear whether there would be unmet needs from other authorities. There was not an effective basis to determine what role Charnwood should have in meeting needs within the HMA and what the appropriate level of housing provision should be to achieve this.

26. As noted above however, the Leicester and Leicestershire authorities had already commissioned a new joint SHMA. They were also committed to work on assessing the potential capacity to accommodate housing in each area and to co-operation with a view to agreeing a distribution of housing across the HMA. The examination was suspended to allow this work to be completed.
27. The 2014 SHMA (published in June 2014) drew conclusions on the objectively assessed need for housing (OAN) in each authority and the HMA as a whole for the periods 2011 to 2031 and 2011 to 2036, giving in each case a lower and upper annual figure. All of the Leicester and Leicestershire authorities subsequently signed up to a Memorandum of Understanding which endorses figures for OAN covering 2011 to 2028 to correspond with the period covered by the Core Strategy. These are derived from the annual figures for 2011 to 2031 set out in the 2014 SHMA. On the basis of updated Strategic Housing Land Availability Assessments (SHLAAs), the Memorandum of Understanding also confirms that each authority considers that it can meet the upper figure for identified needs within its own area to 2028.
28. The Council and the other Leicester and Leicestershire authorities all confirmed that they considered the upper figures set out in the 2014 SHMA to represent OAN. For the HMA as a whole this is 4,215 homes per year and for Charnwood 820 homes per year. They also considered it appropriate to align the base date of the Core Strategy with the 2014 SHMA i.e. 2011.
29. The national Planning Practice Guidance (PPG) recognises that establishing future need for housing is not an exact science. It emphasises that household projections published by the Department for Communities and Local Government (DCLG) should provide the starting point, but makes it clear that there may be other factors that should be taken into account.
30. The 2011-based interim household projections were the most up to date available at the time the 2014 SHMA was prepared. These only cover a ten year period up to 2021 however. In addition there are concerns regarding the extent to which they were influenced by economic circumstances and conditions in the housing market and specifically how this may have suppressed household formation rates. Whilst various approaches are put forward to address these concerns, it is clear that some caution needs to be applied in using the 2011-based interim household projections and it is not appropriate to simply roll them forward beyond 2021 without further analysis.
31. In extending the 2011-based interim household projections to 2031 and 2036, I consider that the 2014 SHMA makes reasonable and justified assumptions in terms of future migration. Specifically, I am satisfied that the approach to unattributable population change (the difference between rolled forward 2011 mid-year population estimates and Census based mid-year estimates) is appropriate given the particular situation in the HMA. The scale of unattributable population change is substantial, averaging 1,269 per year for

the HMA between 2005 and 2010 with particularly significant figures in Leicester City, Charnwood and Oadby and Wigston. I consider it reasonable and pragmatic to assume that half of that is due to an underestimate of migration. The assumption on unattributable population change affects the analysis of potential OAN for each authority differently; for Leicester City there is a significant increase and for Melton a very marginal increase whereas for the other authorities it results in a lower potential OAN. Overall in the HMA however, it has a very limited effect on the potential OAN, increasing it marginally.

32. The 2014 SHMA accepts that the 2011-based household projections were affected by suppressed household formation rates and that economic and market conditions at the time were a key factor in this. However, it points out that lower household formation rates for international migrants are also likely to have had a significant effect. The extent to which 2008-based household projections can be used to assess future housing needs is subject to considerable debate, particularly in relation to whether longer term trends in household formation may return and if so over what period. The 2014 SHMA assumes that household formation rates from 2011 onwards will be at the mid-point between the 2008-based projections and the 2011-based interim projections. I consider this to be a pragmatic and justified approach.
33. Whilst it goes on to assess other factors, the 2014 SHMA states that based on demographic evidence alone, the OAN between 2011 and 2031 would be 3,774 homes per year for the HMA and 814 homes per year for Charnwood.
34. It is useful at this point to compare the findings of the 2014 SHMA in respect of demographic evidence with the 2012-based household projections published after the hearings. Converting these to figures for housing need through a vacancy allowance, the 2012-based household projections indicate a need for 3,532 homes per year in the HMA and 825 per year in Charnwood between 2011 and 2031.
35. In terms of potential employment growth, the 2014 SHMA uses baseline forecasts from “Experian” prepared in autumn 2013 which indicate jobs growth of some 7,300 in Charnwood and some 53,600 in the HMA between 2011 and 2031. The 2014 SHMA makes what I consider to be reasonable and justified assumptions on economic activity rates and the age/sex of migrants to assess levels of housing needed to meet the jobs growth forecast. It then adjusts the distribution of jobs growth between authorities to reflect the current job distribution and again I consider this to be a reasonable step in the process, given that the pattern of past jobs growth in different areas may well not be replicated in future. Whilst this affects the potential OAN for each authority based on jobs growth in different ways, it has a negligible effect on the overall potential OAN for the HMA. Taking the analysis based on jobs growth forecast in isolation, the 2014 SHMA identifies potential OAN between 2011 and 2031 of 3,854 homes per year for the HMA and 690 homes per year for Charnwood.
36. The 2014 SHMA estimates a need for 1,966 affordable homes per year across the HMA between 2011 and 2031 (180 per year in Charnwood). It raises legitimate questions in terms of the realism of meeting this need in its entirety, given the potential availability of funding and the overall level of housing need identified based on demographic and jobs growth evidence. It

also highlights the potential for some of those in need to be housed in the private rented sector. Notwithstanding this, given the scale of affordable housing needs identified relative to the demographic led projections, the 2014 SHMA suggests an upward adjustment to figures for OAN in most of the authorities to support the provision of affordable housing. In the case of Charnwood and Melton however, it considers the demographic led projections to be sufficient to support adequate affordable housing provision.

37. In terms of market signals, it identifies particular issues with house prices and the relationship with incomes in Harborough and Melton and suggests an upward adjustment to OAN for these authorities in response. Evidence on market signals does not support an uplift from demographic led projections in Charnwood or the other authorities.
38. As noted above, taking account of all of these factors the 2014 SHMA concludes that the upper end of the range for OAN between 2011 and 2031 is 4,215 homes per year for the HMA and 820 homes per year for Charnwood.
39. The figure for Charnwood is that based on demographic evidence and is higher than that considered necessary to accommodate projected jobs growth. On the basis of analysis in the 2014 SHMA, the Council clarified during the hearings that 820 homes per year could provide for an increase of some 12,000 in the working population between 2011 and 2031. The 2014 SHMA concludes that no upward adjustment to the figure for Charnwood is required to support jobs growth, nor indeed to support affordable housing needs or address market signals. The upper figures for all of the other individual authorities and the HMA as a whole are above the figures derived from demographic evidence alone, reflecting upward adjustments in terms of jobs growth, affordable housing needs and market signals.
40. The figure for Charnwood correlates almost exactly to the housing needs figure derived from the 2012-based household projections (825 homes per year). The figures for all the other authorities and the HMA as a whole are above those derived from the 2012-based household projections.
41. Whilst there are concerns regarding the extent to which the 2012-based household projections are affected by past economic conditions, they are statistically robust and cover a timeframe beyond the period covered by the Core Strategy. They are the most up to date projections available.
42. The figure for OAN in the HMA set out in the 2014 SHMA is significantly above the starting point provided by the latest household projections and provides sufficient scope to accommodate strong jobs growth, help to deliver the required number of affordable homes and respond positively to market signals.
43. Taking all of the above factors into account I am satisfied that the 2014 SHMA provides an up to date and robust assessment of housing needs in the HMA. On this basis I consider that the OAN (2011 to 2031) is 4,215 homes per year for the HMA and 820 homes per year for Charnwood.
44. The plan period up to 2028 will provide less than a 15 year time horizon from adoption. This is not a specific requirement of the NPPF however and I am satisfied that the time scale of the Core Strategy is appropriate and provides

sufficient basis for planning and development in the Borough, subject to the base date for housing provision being 2011, to align with the evidence from the 2014 SHMA.

45. For the period 2011 to 2028, the OAN would be 13,940 homes for Charnwood and 71,655 for the HMA.
46. All of the authorities in the HMA have undertaken recent updates of their SHLAAs, in accordance with a jointly agreed methodology. Analysis based on these updated SHLAAs indicates that the potential capacity of housing land between 2011 and 2028 (including completions up to 2014) exceeds the OAN for each authority, in some cases by a considerable margin. For the HMA as a whole, the analysis indicates that the potential capacity exceeds the OAN by some 63,500 homes, providing a considerable degree of flexibility.
47. The specific situation in Leicester City is less clear cut however, with the potential capacity up to 2028 only exceeding the OAN by 1,566 homes (the annual OAN figure being 1,350). Looking further ahead to 2031, the analysis indicates that potential capacity would only be marginally above the OAN. I acknowledge that there are concerns that some sites identified in the Leicester City SHLAA update will not come forward as anticipated. On the other hand, I am satisfied that the methodology used in the SHLAA updates is robust. It must also be borne in mind that Leicester City Council is preparing a new Local Plan which provides the opportunity to set out a policy framework to accommodate housing growth. Therefore, whilst there is limited flexibility in the potential capacity for housing, on the basis of evidence available at this point in time there is no reason to conclude that Leicester City would not be able to accommodate its own housing needs up to 2028 or that in overall terms there will be unmet needs within the HMA.
48. Following the close of the hearings I have been made aware that North West Leicestershire District Council is considering a potentially higher level of housing provision for its forthcoming Local Plan than that set out in the 2014 SHMA to align with increased potential jobs growth. However, I am not aware that any formal decision has been taken in this respect. The Memorandum of Understanding referred to above remains in place and there is no firm basis at this stage to suggest that the level of housing provision in Charnwood would need to be re-assessed.
49. There is no requirement to increase housing provision in Charnwood to accommodate unmet need from elsewhere. In order to meet the OAN, the Core Strategy should make provision for at least 820 homes per year (13,940 between 2011 and 2028). Main modification MM1 would increase the overall housing provision in the Core Strategy to this level, amend the timeframe for this provision and clarify that it is to be regarded as a minimum. It would also clarify the context of joint working and co-operation with the other authorities in the HMA. Subject to this modification the Core Strategy would be positively prepared, justified, effective and consistent with national policy in relation to the overall provision for housing.

Issue 2 – Whether the Core Strategy has been positively prepared and whether it is justified, effective and consistent with national policy in relation to employment and economic development

50. The submitted Core Strategy indicated that some 13,400 new jobs would be needed in the Borough between 2010 and 2031. This was based on the Leicester and Leicestershire HMA Employment Land Study of 2013. The Core Strategy seeks to provide for up to 75ha of employment land including up to 8,750sqm of office space at the Watermead Regeneration Corridor. In addition it proposes 77ha of land for an extension to the Loughborough Science and Enterprise Park (the Science and Enterprise Park).
51. As noted above, the baseline forecast used in the 2014 SHMA predicts jobs growth in Charnwood of some 7,300 between 2011 and 2031 whereas it is estimated that the OAN of 820 homes per year could provide for a growth in the workforce of some 12,000. The Council accepted during the hearings that it was necessary to align the approach to housing and jobs growth and to reflect up to date evidence.
52. There is not a specific correlation between the overall growth in jobs and the amount of employment land to be provided. Jobs will be provided across a wide range of sectors and in a variety of locations, not all on designated employment sites. Plot ratios and job densities on employment sites can also vary significantly depending on location and the particular mix of uses. It is also important to provide flexibility and choice.
53. Using what I consider to be reasonable assumptions, the Council estimated that 75ha of employment land, including provision for office based employment anticipated in the Watermead Regeneration Corridor would deliver some 8,400 jobs.
54. It is envisaged that the extension to the Science and Enterprise Park would be developed in phases and that around 40% of the site would be retained as green infrastructure. On this basis it is expected that approximately 21ha of land would be developed in the plan period. I deal with the specific proposal for the extension to the Science and Enterprise Park in more detail later in my report. However, it is likely to provide specialist forms of employment, focussing on the University's own activities and the research and development sector. I acknowledge that it will have a wide sphere of influence in the sub-regional economy and that the land in question should not be seen in the same light as sites intended for more general employment purposes. On the other hand, whilst I accept that many of those employed would live further afield, I consider that the extension to the Science and Enterprise Park would also provide significant employment potential for the Borough's residents.
55. Taking all of these factors into account I am satisfied that the provision of 75ha of employment land including specific proposals for office development at the Watermead Regeneration Corridor and in addition to the Science and Enterprise Park is justified and appropriate. Whilst this would represent an increase in take up rates compared with past trends, it would ensure flexibility and choice and assist in facilitating economic growth. In overall terms I consider that there would be a broad alignment between the scale of employment land proposed and the likely growth in the workforce associated

with the planned level of housing.

56. Whilst the overall approach to employment and economic development is appropriate, the Core Strategy lacks sufficient clarity in terms of the sources of supply of employment land and the scale of development envisaged at strategic locations during the plan period. It is also not clear that main town centre uses on employment sites will need to be considered in the light of Policy CS9 (Town Centres and Shops). Main modification MM5 would address these concerns and also clarify the timeframe for provision as 2011 to 2028. Along with main modification MM1 it would also ensure that the Core Strategy reflected up to date evidence regarding jobs growth and that the approach to housing and jobs growth was broadly aligned.
57. Subject to these modifications the Core Strategy would be positively prepared, justified, effective and consistent with national policy in relation to employment and economic development.

Issue 3 – Whether the development strategy set out in Policy CS1 is justified, effective and consistent with national policy

58. The PUA is a long standing concept reflecting the fact that the continuous built up area of Leicester extends beyond the administrative boundaries of the City Council. The PUA includes Birstall and Thurmaston in the south of Charnwood. They form part of the edge to the urban area of Leicester and have strong physical and functional links with it.
59. Whilst the PUA was a key element of the now revoked Regional Plan, it remains in my view a valid, sustainable approach to planning given the particular relationships between the urban area of Leicester and surrounding authorities such as Charnwood. The HRS estimated that 44% of the housing needs of the Borough were generated by in migration from Leicester City.
60. Loughborough is by some way the largest town in the Borough, providing a wide range of services and facilities and access to employment. It has good public transport links and acts as the focus for the north of the Borough. Although Shepshed is a distinct and separate settlement, it has clear functional links with Loughborough and strong interactions in terms of commuting patterns.
61. Anstey, Barrow upon Soar, Mountsorrel, Quorn, Rothley, Sileby and Syston are all sizeable villages (population above 3,000), have a good range of services and facilities and reasonable public transport links. They play an important role in meeting the daily needs of their own residents and those living in the surrounding areas and are defined as Service Centres.
62. Beyond this there are a number of other settlements with some key services and access to public transport and small villages and hamlets with few or no services and facilities.
63. The development strategy is one of urban concentration and regeneration, focussing development on the PUA in the south of the Borough (approximately 42% of housing and up to 46ha of employment land) and Loughborough and Shepshed in the north (approximately 37% of housing and up to 22ha of employment land). Beyond this, development is directed primarily towards

the Service Centres (approximately 18% of housing and up to 7ha of employment land) with limited development envisaged in other settlements with key services (approximately 3% of housing).

64. I deal with the specific proposals for Sustainable Urban Extensions (SUEs) and Directions of Growth in detail later in my report. The overall housing figures for the PUA, Loughborough and Shepshed, the Service Centres and other settlements set out in Policy CS1 are based on an annual Borough wide figure of 790 homes and cover 2006 to 2028. As set out above, I have concluded that the annual figure should be increased to 820 homes and provision should relate to 2011 to 2028.
65. Notwithstanding this, I consider that the development strategy and the broad distribution of housing and employment development proposed is appropriate and justified. It rightly seeks to steer the majority of development to the larger urban areas (the PUA and Loughborough and Shepshed) which provide the best access to jobs, services and public transport. At the same time it recognises the need for development (albeit on a lesser scale) across a wide range of sustainable smaller settlements with the focus being on those with the greatest range of services and best access to public transport (Service Centres).
66. Overall I consider that the development strategy strikes the right balance between urban concentration and ensuring a reasonable spread of development across suitable settlements. It provides for a considerable degree of choice and flexibility in terms of potential sites.
67. Service Centres and other settlements have clearly come under considerable pressure for housing development in recent times, not least due to the difficulty in demonstrating an adequate supply of housing land in the Borough. There have been significant levels of housing completions since 2011 and there is a substantial stock of existing commitments (sites with planning permission or subject to s106 agreements) in these settlements².
68. In addition to adjusting the specific housing provision figures in Policy CS1 to reflect an increased annual requirement of 820 and a time period covering 2011 to 2028, it is also necessary to take account of the significant scale of completions and commitments in Service Centres and other settlements. Whilst there is a need to maintain the basis of the development strategy and to ensure flexibility in terms of the balance between potential supply and planned provision, I consider it appropriate to marginally increase the proportion of planned provision in these settlements to take account of completions and commitments with a corresponding marginal reduction in the proportion planned for the PUA and Loughborough and Shepshed.
69. I am satisfied that the lists of Service Centres, other settlements and small villages and hamlets set out in Policy CS1 are appropriate and justified by evidence relating to their role and level of services. Given the reality of the situation in terms of completions and commitments, the distribution of housing between individual Service Centres and other settlements is to a large extent

² Service Centres- 778 completions since 2011 and 2,682 commitments as of Nov 2014
Other settlements- 211 completions since 2011 and 676 commitments as of Nov 2014

already established. There is no need for Policy CS1 to be more specific in this respect.

70. Given that there are seven settlements involved, Policy CS1 lacks sufficient flexibility in relation to the amount of employment land to be provided for in Service Centres.
71. Main modification MM1 would ensure that the housing figures for the PUA, Loughborough and Shepshed, Service Centres and other settlements reflected the overall Borough provision of 820 homes per year, covered the period 2011 to 2028 and took account of the extent of completions and commitments in Service Centres and other settlements. It would also ensure a more flexible approach to the amount of employment land to be provided in Service Centres.
72. Subject to this modification the development strategy set out in Policy CS1 would be justified, effective and consistent with national policy.

Issue 4 – Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy

73. The submitted Core Strategy included a housing trajectory based on providing for 17,380 homes between 2006 and 2028 (22years x 790 homes). During the examination the Council updated its position regarding the housing trajectory, initially to reflect the significant number of recent commitments but then also to address concerns regarding the timescales and rates of delivery for the proposed SUEs and the Direction of Growth North of Birstall. The latest trajectory produced by the Council took account of commitments as of November 2014 (PSD/74).
74. As set out above, the Core Strategy needs to make provision for at least 13,940 homes between 2011 and 2028 (17years x 820 homes). Rates of demolitions/conversions have been minimal and there is no need to increase provision to take account of this factor.
75. On the basis of the updated trajectory, the Council estimates that the supply of housing land between 2011 and 2028 would total some 15,436 homes³. This is made up of completions between 2011 and 2014 (1,802), commitments as of November 2014 (6,599) and the SUEs and Direction of Growth North of Birstall (7,035).
76. I deal with the proposed SUEs and Direction of Growth in more detail later in my report. However, I consider that the Council's most up to date trajectory takes a reasonable approach to the delivery of homes from these large strategic proposals, recognising that lead in times will be longer and the overall number of dwellings expected to be delivered by 2028 will be less than originally envisaged in the submitted Core Strategy. Whilst it remains in my view optimistic, I am satisfied that the revised trajectory takes a realistic view of likely start dates and annual rates of completions from these strategic sites.

³ This figure excludes an allowance for 130 dwellings on unspecified sites in the PUA which was included in PSD/74

77. Prior to the further hearing sessions, the Council provided detailed information on all of the individual sites and anticipated timescales for delivery on commitments as of 30 September 2014 (PSD/41). This included three sites at Shepshed categorised under the Direction of Growth. Information was also provided on other significant individual site commitments that had come forward since 30 September 2014. All of the sites that make up the commitments as of November 2014 (6,599) were individually identified therefore and in the vast majority of cases, the Council had set out anticipated annual rates of delivery.
78. During the further hearing sessions the Council confirmed its assumptions regarding lead in times and annual rates of development. It also provided a breakdown of commitments as of November 2014 by individual settlement (PSD/55), information demonstrating a low rate (approx. 2%) of lapsed planning permissions (PSD/61) and that in overall terms the number of dwellings in reserved matters permissions matched those in outline permissions (PSD/62). Further detailed information on commitments at Shepshed as of November 2014 was also provided (PSD/85). In addition, evidence showing that windfall completions on sites for less than 5 dwellings had averaged 80 per year since 2006 was submitted (PSD/57).
79. In overall terms I consider that there is sufficient evidence to support the Council's assessment of the potential supply of housing land. I am satisfied that the Council has carried out a robust and thorough assessment and has used reasonable assumptions in terms of whether sites are deliverable and developable and over what timescale.
80. There is considerable flexibility within the overall supply to compensate for some committed sites not coming forward as anticipated or for strategic sites to progress at a slower rate than expected. The trajectory does not include an allowance for windfalls which may come forward and give additional flexibility.
81. Taking account of completions to date and the extent of existing commitments, the Core Strategy makes adequate provision for housing between 2011 and 2028. In addition to providing flexibility and choice, the supply and distribution of housing land across the Borough is necessary to deliver the development strategy, focussing significant growth on the PUA, Loughborough and Shepshed.
82. The level of housing completions has been below the annual requirement set by the former Regional Plan in every year since 2008. Total completions since 2006 were below the figure required. Completions since 2011 have been well below the annual requirement of 820 homes. I consider that there has been persistent under delivery of housing. The Council accepts that this is the case. In terms of a five year supply it is appropriate to apply a 20% buffer brought forward from later in the plan period in line with paragraph 47 of the NPPF. As set out in the PPG, the aim should be to deal with undersupply within the first five years where possible.
83. As of 1 April 2015 the basic five year requirement would be for 4,100 homes

(5 x 820). Adding the under supply between 2011 and 2015⁴ (755 homes) gives a total of 4,855 homes. Applying the 20% buffer to this would give a total five year requirement of 5,826 homes.

84. The Council estimates that the five year supply of deliverable sites from 1 April 2015 would total some 6,245 homes. Approximately 75% of this supply would be made up of existing commitments with the remainder coming from the proposed strategic sites.
85. Again I consider that the Council has used reasonable and justifiable assumptions in terms of whether sites are deliverable within the five year period. I consider that the Core Strategy would provide for a five year supply of housing land while addressing the shortfall to date within the first five years and providing a 20% buffer. There would be some flexibility should sites not come forward as planned. Additional flexibility would be provided by as yet unidentified windfall sites. I am satisfied that a five year supply of housing land can be maintained.
86. Main modification MM18 is necessary to provide a realistic housing trajectory which reflects up to date evidence in relation to existing commitments. Subject to this modification the approach towards the supply and delivery of housing land would be justified, effective and consistent with national policy.

Issue 5 – Whether the approach towards strategic housing needs and affordable housing in Policy CS3 is justified, effective and consistent with national policy

87. The 2014 SHMA identifies a need for an average of 180 affordable houses per year in the Borough up to 2031. For the period between 2011 and 2028, this would equate to a total need for 3,060 affordable houses. An average of 150 affordable houses per year were delivered between 2011 and 2014.
88. Policy CS3 seeks the provision of a proportion of affordable houses as part of market housing developments. The targets for the proportion of affordable houses sought vary across different settlements, based on evidence relating to market values and the potential effect on viability. Provision would be sought on sites of 10 or more dwellings in urban areas and Service Centres and 5 or more in rural locations, reflecting the nature of development in these smaller settlements.
89. I am satisfied that evidence supports the need to seek affordable housing provision on the level envisaged and that the site size thresholds and proportions sought in different locations reflect available evidence.
90. Policy CS3 sets out a clear yet flexible approach which would take account of the effect on the viability of development proposals along with other site specific factors.
91. Main modification MM2 would ensure that the policy reflected up to date evidence from the 2014 SHMA on affordable housing needs, give consistency with Policy CS1 in terms of overall housing provision between 2011 and 2028

⁴ Calculated using actual completion figure of 723 for 2014/15 – PSD/101

and clarify that the specific locations set out in the policy related to settlements.

92. Subject to this modification the approach towards strategic housing needs and affordable housing in Policy CS3 would be justified, effective and consistent with national policy.

Issue 6 – Whether the approach towards Gypsies, Travellers and Travelling Showpeople in Policy CS5 is justified, effective and consistent with national policy

93. The Leicestershire, Leicester and Rutland Gypsy and Traveller Needs Assessment Refresh published in 2013 was commissioned jointly by the authorities in the HMA. It provides robust and up to date evidence on pitch and plot requirements up to 2031 for Charnwood and the other Leicester and Leicestershire authorities.
94. Policy CS5 is based on this evidence and seeks to meet identified needs as part of the strategic housing proposals and additional site allocations. I consider that in overall terms the policy takes a positive and proactive approach with a clear commitment to meet identified accommodation needs. It will enable a 5 year supply of deliverable sites to be achieved. Needs have been identified on a Borough wide level and there is no evidence of specific needs for sub areas within the Borough or that there are unmet needs from other authorities. Bringing forward sites for Gypsy, Traveller and Travelling Showpeople accommodation as part of the strategic housing proposals would enable them to be well related to the main urban areas, to benefit from good access to services and facilities and to be delivered as part of a comprehensively planned development.
95. Whilst the approach is broadly appropriate, Policy CS5 itself lacks sufficient clarity in terms of overall accommodation needs and how the criteria for additional sites would be applied. It also fails to recognise that the figures for pitches and plots should be expressed as minima to provide flexibility. Main modification MM4 would address these concerns, clarify the role of the Site Allocations and Development Management Development Plan Document (SA and DM DPD) and reflect other modifications in respect of development at Shepshed dealt with later in my report.
96. Subject to this modification the approach towards Gypsies, Travellers and Travelling Showpeople in Policy CS5 would be justified, effective and consistent with national policy.

Issue 7 – Whether the approach towards Town Centres and shops in Policy CS9 is justified, effective and consistent with national policy

97. Policy CS9 sets out a comprehensive approach to retailing and other main town centre uses. It is informed by the Charnwood Retail and Town Centre Study- 2013 Update which provides up to date and robust evidence for the hierarchy of centres and the requirements for additional floorspace.
98. The policy is justified in seeking to focus new development on Loughborough Town Centre and takes a proactive approach in identifying areas for new development and regeneration. The thresholds for requiring impact

assessments for development proposals are justified by evidence on the potential effect on centres.

99. However, the policy lacks sufficient clarity in terms of how the sequential approach to main town centre uses and the requirements for impact assessments would be applied. It also provides insufficient guidance on the proportion of additional floorspace envisaged in Loughborough. Given that Thurmaston Retail Park is not recognised as a centre, the specific references to it are inconsistent with the overall approach of Policy CS9 and national policy.
100. Main modification MM6 would address these issues and subject to this the approach towards Town Centres and shops in Policy CS9 is justified, effective and consistent with national policy.

Issue 8 – Whether the SUEs at the PUA and Loughborough are justified in principle

101. I have considered the proposed SUEs (and Direction of Growth for a SUE North of Birstall) in the light of my conclusions regarding overall housing and employment land requirements in the Borough, the development strategy and the approach towards the supply and delivery of housing land. I have taken account of the up to date evidence regarding housing commitments. I deal with the specific situation arising from the significant number of recent commitments in Shepshed under Issue 14.
102. As set out above, there is a need to ensure an adequate supply of housing land to meet the Borough wide requirement of 820 homes per year. In doing so it is necessary to provide for a reasonable degree of flexibility and choice and to focus growth on the PUA and Loughborough and Shepshed. Adequate provision for employment land also needs to be made in appropriate and deliverable locations in line with the development strategy.
103. Notwithstanding the scale of existing housing commitments, there is still a need to identify significant amounts of additional housing land to meet overall requirements up to 2028 and provide flexibility and choice and to provide for a five year supply of deliverable sites. I am satisfied that the Council has considered reasonable alternatives in terms of accommodating growth. There is a limited supply of potential housing land within existing built up areas. Significant extensions to settlements are inevitable in order to deliver sufficient housing.
104. There are convincing arguments in favour of large planned extensions to the urban areas. Compared with a more dispersed approach involving a number of smaller extensions to the urban areas and Service Centres, they provide better opportunities for the co-ordinated delivery of social and community infrastructure, particularly given the limitations on the pooling of developer contributions from a number of development sites. A larger scale development gives scope for employment and retail provision within the site itself. It is likely to be more self-contained in terms of travel patterns, assist in the provision of public transport and promote its use.
105. Whilst there may be physical capacity to expand Service Centres, the scale of housing required, combined with recent completions and existing

commitments, would be significant in relation to the level of services and facilities available and public transport links. It would be such that it is likely to have a significant effect on the character and separate identity of the settlements concerned.

106. Completions since 2011 and existing commitments are disproportionately focussed on the Service Centres (and other settlements) in relation to their size and role and planned levels of provision across the Borough. In order to redress the balance and to ensure that the development strategy is implemented, it is necessary to direct future growth to the PUA and Loughborough (in addition to existing commitments at Shepshed).
107. Taking these factors into account I consider that in principle the approach of identifying SUEs (and Direction of Growth for a SUE North of Birstall) is appropriate and justified.

Issue 9 – Whether the SUE North East of Leicester proposed in Policy CS19 is justified, effective and consistent with national policy

108. The Core Strategy proposes a SUE North East of Leicester. It would involve land adjacent to the PUA east of Thurmaston and north of Hamilton⁵ and is intended to accommodate approximately 4,500 homes in total. The submitted Core Strategy envisaged some 3,750 homes being delivered up to 2028 with the remainder beyond the plan period. The SUE would also be expected to provide for up to 13ha of employment land, schools, shops, a range of other social and community facilities and green infrastructure. Policy CS19 would require a site for Gypsies and Travellers and a site for Travelling Showpeople to be included within the SUE and would seek 30% affordable housing provision. A range of transport improvements and mitigation measures would also be required.
109. An application for outline planning permission for up to 4,500 dwellings, 13ha of employment land and associated social and community infrastructure was submitted to the Council in December 2013. The Council resolved to grant permission in November 2014, subject to a s106 agreement.
110. I am satisfied that the Council has considered reasonable options for a SUE in the south of the Borough and reached a justifiable conclusion in respect of the merits of the alternatives. The proposed SUE would be able to accommodate housing on a scale that would make a critical contribution to overall housing supply and bring with it significant new social and community infrastructure and transport improvements, providing for a reasonable degree of self-containment, whilst building on close physical and functional links with the wider urban area of Leicester. It provides scope for substantial areas of green infrastructure. Coupled with the topography this would allow the separate identities of surrounding settlements to be retained.
111. Options involving the SUE extending further towards Syston would be less well related to the urban area and impact on settlement identity. There are physical, environmental and practical limits to the scale of development that could be accommodated South of Anstey and North of Birstall. They would not

⁵ Hamilton forms part of the PUA and is within Leicester City

in themselves be capable of delivering the scale of development required.

112. The scale of development proposed is necessary to ensure an adequate and flexible supply of housing for the plan period and to deliver the strategy of urban concentration. It will also enable employment opportunities and key infrastructure and social and community facilities to be brought forward comprehensively as part of the development.
113. The development of the SUE will inevitably result in some adverse impacts. There will be substantial increases in traffic flows. Without adequate mitigation this would place undue pressure on the local road network, lead to significant congestion and potentially impact on noise levels and air quality. However, Policy CS19 requires a range of transport mitigation and improvement measures including capacity improvements, a spine road through the site and improvements to public transport links. As Highway Authority, Leicestershire County Council has undertaken a thorough and robust assessment of the transport implications of the SUE and is satisfied that adequate mitigation can be put in place. On the basis of evidence available, I share this view. There would be scope to review transport mitigation measures as the development of the SUE progressed.
114. Although on the edge of the urban area, the SUE is predominantly in agricultural use and currently has an open and essentially rural character. Development on the scale proposed will clearly change the character and visual appearance of the land in question, resulting in an urbanisation of the countryside. This would be true of any substantial extension to the built up area however. In this case, it is intended to utilise the topography to provide some visual containment below ridgelines and to incorporate substantial areas of green space/landscaping. Policy CS19 makes it clear that the separate identities of Syston, Barkby and Barkby Thorpe will be protected.
115. The site itself does not contain any designated heritage assets. However, the Barkby and Barkby Thorpe Conservation Area lies very close to it. There are a number of Listed Buildings in the wider area, including several in Barkby. There are two Scheduled Monuments to the south east of the site, the Hamilton Deserted Medieval Village (approximately 280m from the boundary) and the Roman Villa (approximately 600m from the boundary).
116. It is intended to incorporate areas of greenspace/landscaping around the edge of the site. This would assist in maintaining a clear separation between the proposed built development and the surrounding heritage assets and provide some screening. Policy CS19 and other relevant policies include safeguards in terms of the impact on heritage assets. Whilst there would be some impact on the setting of the Barkby and Barkby Thorpe Conservation Area and the listed buildings at 32 Main Street, Barkby and the associated barn, this would be limited. Built development would be some distance from the Scheduled Monuments, whose setting is already influenced by substantial built development at Hamilton. Further built development as part of the SUE would have an impact on the setting of the Scheduled Monuments but again this would be limited.
117. Whilst there would be an impact on the setting of these designated heritage assets, I consider that this would constitute less than substantial harm to their

significance. Having regard to the statutory duties relating to the preservation of such assets, I have given this harm considerable importance and weight. However, the provision of a substantial number of new homes to meet the needs of the Borough, including significant amounts of affordable housing, along with employment land and social and community infrastructure represent considerable public benefits. Public benefits would also arise from the support that would be provided for jobs in construction and the wider supply chain, increased expenditure and economic activity in the area and funds through the New Homes Bonus. Taken together I consider that the public benefits of the proposed SUE would outweigh the harm to the significance of heritage assets.

118. There are no designated nature conservation sites within or close to the SUE and there is potential to enhance the ecological value of those parts of the site left undeveloped. The layout of development and mitigation measures are capable of minimising flood risk. Whilst there would be some loss of the best and most versatile agricultural land, this would be outweighed by the significant benefits of the proposal.
119. Development of the SUE will clearly bring significant change to the local area and I appreciate the strong concerns of local residents, community groups and other organisations. However, Policy CS19 and other policies in the Core Strategy provide clear mechanisms for mitigation and safeguards in terms of the potential effects of the development. The SUE will bring with it substantial benefits in terms of meeting the Borough's development needs in a sustainable manner. These benefits outweigh any residual harm associated with the SUE following mitigation.
120. The development of such a large site over many years will undoubtedly be a complex process. It will require careful planning, there are significant infrastructure requirements and costs and issues still to resolve in terms of land ownership for some of the site. However, I am satisfied that there are no insurmountable physical or other constraints and that mechanisms can be put in place to ensure that necessary infrastructure is provided as the development progresses. There is clearly strong interest in developing the site, and proposals are well progressed. On the basis of available evidence I consider that the SUE would be viable and realistically deliverable.
121. The size of the site gives some flexibility in terms of the layout of built development and in particular the location of employment development relative to areas of new housing. I see no reason in principle why all of the key elements of the SUE could not be accommodated.
122. Policy CS19 (in association with Policy CS3) provides a justified and sufficiently flexible approach to affordable housing provision as part of the SUE.
123. Given the scale and complexity of the proposal and the extent of progress to date, I consider it unrealistic to expect the first housing completions on the site in 2015/16 and for completions up to 2028 to reach the figure of 3,750 envisaged in the submitted Core Strategy. The Council acknowledged that this was the case and suggested that it was now in fact likely that the first completions would take place in 2016/17 with fewer completions expected in the first year and some 3,250 homes being delivered up to 2028. Whilst it is

still optimistic and depends on good progress and a strong housing market, I consider this to be a realistic scenario. Main modification MM11 would amend the figures accordingly.

124. This main modification would also provide necessary flexibility in terms of the size of the site for Travelling Showpeople and the size of retail units within the proposed local centre. In addition it would clarify the relationship between the site boundary on the Policies Map and the concept masterplan included in the Core Strategy for illustrative purposes. It would also provide necessary certainty by amending the site boundary to include the land required for the north west link road.
125. Taking account of all of the above I consider that subject to main modification MM11, the SUE North East of Leicester proposed in Policy CS19 is justified, effective and consistent with national policy.

Issue 10 – Whether the North of Birstall Direction of Growth proposed in Policy CS20 is justified, effective and consistent with national policy

126. Policy CS20 proposes a Direction of Growth for a SUE North of Birstall. It is intended that a site for the SUE would be allocated in the SA and DM DPD. The submitted Core Strategy envisaged at least 1,500 homes being delivered up to 2028. The SUE would also be expected to provide for up to 15ha of employment land, a primary school, shops, a range of other social and community facilities and green infrastructure. Policy CS20 would require a site for Travelling Showpeople to be included within the SUE and would seek 30% affordable housing provision. A range of transport improvements and mitigation measures would also be required.
127. There is clear interest in bringing forward a planning application for the development of a SUE in this location. The Council is working with interested parties and anticipates an application being submitted by December 2015 (see PSD/101).
128. Reasonable alternative options for an additional SUE in the south of the Borough have been considered and I am satisfied that the Council has reached a justifiable conclusion in respect of the merits of the alternatives. Although not capable of delivering development on the same scale as the SUE North East of Leicester, the proposed Direction of Growth would be able to make a significant and necessary contribution to overall housing supply and bring with it new social and community infrastructure, providing for a reasonable degree of self-containment, whilst building on close physical and functional links with the wider urban area of Leicester. It is very close to the Birstall Park and Ride facility. It provides the opportunity to incorporate significant areas of green infrastructure and work within landscape features to maintain the separate identity of Rothley.
129. The alternative option North of Glenfield would not be able to accommodate sufficient housing due to the physical constraint of the A46 and would affect a more sensitive landscape and the Green Wedge. The option south and east of Syston would significantly expand a Service Centre rather than develop adjacent to the PUA. It would reduce the separation with Thurmaston. It would also raise concerns over delivery and cumulative impact given the very

close proximity to the SUE North East of Leicester. The option south of Anstey would again expand a Service Centre and compromise its separate identity in relation to the PUA. It also has limited capacity due to the constraints of the A46.

130. The scale of development proposed is necessary to ensure an adequate and flexible supply of housing and to deliver the strategy of urban concentration. It will also enable employment opportunities and key infrastructure and social and community facilities to be brought forward comprehensively as part of the development, whilst maintaining a reasonable degree of separation with Rothley. At the time of submission, work on a potential site allocation had not progressed sufficiently. Rather than delay the Core Strategy, the Council took what I consider to be a reasonable and pragmatic view and proceeded with a broader Direction of Growth.
131. The character and appearance of the area will inevitably be affected by the extension of built development northwards from the existing urban area of Birstall which is currently contained by the A46. The proposal will also involve the loss of agricultural land. The intention is that built development would be largely focussed on lower lying land near the A6 however, which would reduce the impact on the wider landscape. It is also intended to incorporate a significant buffer of green space between the proposed development and Rothley, maintaining the separate identity of the village.
132. There are no designated heritage assets within the Direction of Growth and there would be sufficient distance between built development and nearby heritage assets including the Rothley and Rothley Ridgeway Conservation Areas to avoid any harm to them or their setting. There are no nature conservation designations within or close to the Direction of Growth. Subject to appropriate improvements and mitigation measures, the increased traffic from the Direction of Growth could be accommodated safely and without undue increases in congestion.
133. Policy CS20 and other policies in the Core Strategy provide clear mechanisms for mitigation and safeguards in terms of the potential effects of the development.
134. I am satisfied that there are no significant physical or other constraints to development and that mechanisms can be put in place to ensure that necessary infrastructure is provided as the development progresses. There is clearly strong interest in developing the proposal. I consider on the basis of evidence available that the Direction of Growth would be viable and realistically deliverable.
135. Policy CS20 (in association with Policy CS3) provides a justified and sufficiently flexible approach to affordable housing provision.
136. Taking account of the scale and complexity of the proposal and the extent of progress to date, I consider it unrealistic to expect the first housing completions in 2015/16 as envisaged in the submitted Core Strategy. The Council acknowledged that this was the case and its updated trajectory is based on the first completions taking place in 2017/18 with some 1,345 homes being delivered up to 2028. Although this remains optimistic and

depends on good progress and a strong housing market, I consider it to be realistic. Main modification MM12 would amend the figures accordingly.

137. As submitted, Policy CS20 lacks sufficient flexibility in terms of the size of the site for Travelling Showpeople and the size of retail units within the proposed local centre. It also lacks sufficient clarity as to the area being considered for development and its relationship with key physical boundaries. In addition, the Council accepted that there was no longer a justification or requirement for a link road from the A6 to the Wanlip junction or a Wanlip bypass. Main modification MM12 would also address these concerns.
138. In light of the above, I consider that subject to main modification MM12, the North of Birstall Direction of Growth proposed in Policy CS20 is justified, effective and consistent with national policy.

Issue 11 – Whether the Watermead Regeneration Corridor Direction of Growth proposed in Policy CS21 is justified, effective and consistent with national policy

139. The Watermead Regeneration Corridor Direction of Growth is proposed through Policy CS21. It is intended that specific sites will be allocated in the SA and DM DPD. The proposal seeks to continue on from long standing environmental improvement initiatives by regenerating existing employment areas and creating new areas of economic activity. It also seeks to bring forward opportunities for residential and leisure development, improving links and accessibility to the Watermead Country Park.
140. The Direction of Growth is well situated in relation to the road network and the PUA and due to its accessible location provides a good opportunity to contribute to the range of employment land needed to meet strategic requirements. It also provides an opportunity to contribute towards the needs for office development which cannot be met in Leicester City. The scale of employment land envisaged (some 16ha with an additional area for office development) is justified by the potential opportunities available and the need to ensure a reasonable distribution of sites across the PUA and the Borough as a whole. The Council has worked closely with Leicester City Council to ensure that the scale of office development at Watermead is relatively modest and would not undermine efforts to focus such development on the City Centre. Given this and the evidence available, I consider that it is appropriate that the policy sets a clear limit to the amount of office floorspace (8,750sqm).
141. Whilst the policy provides necessary flexibility in terms of the types of uses that may come forward, it is not sufficiently clear that proposals for offices and other main town centre uses would need to be considered in the light of the sequential approach to such development and take account of the potential impact on centres. Main modification MM13 would address this concern by incorporating clear references to modified Policies CS6 and CS9.
142. Policy CS21 and other policies in the Core Strategy provide clear mechanisms for mitigation and safeguards in terms of the potential effects of the development including in relation to flood risk. I am satisfied that detailed proposals could be brought forward to ensure that development is compatible with the country park and to deal with the physical constraints which arise

from close proximity to water courses and bodies of water. There is clearly strong developer interest in bringing proposals forward. I consider that the Direction of Growth would be viable and realistically deliverable.

143. Subject to main modification MM13, the Watermead Regeneration Corridor Direction of Growth proposed in Policy CS21 is justified, effective and consistent with national policy.

Issue 12 – Whether the West of Loughborough Sustainable Urban Extension proposed in Policy CS22 is justified, effective and consistent with national policy

144. The submitted Core Strategy proposes a SUE West of Loughborough which is intended to accommodate approximately 3,000 homes in total. It envisages at least 2,500 homes being delivered up to 2028 with the rest beyond the plan period. The SUE would also be expected to provide for up to 16ha of employment land, schools, shops, a range of other social and community facilities and green infrastructure. Policy CS22 would require a site for Gypsies and Travellers and a site for Travelling Showpeople to be included within the SUE and would seek 30% affordable housing provision. A range of transport improvements and mitigation measures would also be required.
145. An application for outline planning permission for up to 3,200 dwellings, 16ha of employment land and associated social and community infrastructure was submitted to the Council in September 2014.
146. I have dealt with the principle of the proposed SUEs above, however it is worth re-emphasising that I consider the SUE West of Loughborough to be justified in principle both in terms of housing land supply and the development strategy. I have reached this view in the context of the updated information on commitments provided during the examination, which showed increased potential supply across the Borough and in particular a significant increase in recent commitments at Shepshed.
147. It is argued by a number of representors that the scale of recent commitments and the effect on overall housing land supply no longer justifies the SUE, or at least would only justify a proposal on a much smaller scale. I consider the SUE to be a crucial element of the overall supply of housing land in the Borough. Without it, there would be a shortfall in housing land supply over the plan period and a lack of a five year supply of deliverable sites. A much reduced proposal (a figure of 800 houses has been suggested) would remove any flexibility in overall housing land supply and could well undermine the ability to provide a five year supply of deliverable sites. This would also be the case if such a number of additional houses were allocated to Service Centres, rather than the SUE.
148. Deleting or substantially scaling down the SUE, or replacing it with a smaller number of additional houses in Service Centres, would significantly reduce the focus of new housing on Loughborough and Shepshed and undermine the overall development strategy. Furthermore, development on a much reduced scale would not provide the opportunity to deliver the proposed social and community infrastructure as part of a comprehensive scheme. In addition there is no evidence that a significantly reduced scheme would be a viable and

deliverable proposition.

149. The proposed distribution of housing set out in the submitted Core Strategy (Policy CS1 and Fig1) had already taken account of commitments as of March 2012 and specific additional provision for a Direction of Growth at Shepshed. Total provision (including completions and commitments) of at least 6,450 homes in Loughborough and Shepshed between 2006 and 2028 (293/yr) represented some 37% of the Borough total. In the light of my findings on other issues, estimated total supply in Loughborough and Shepshed between 2011 and 2028 would be 5,363 homes (315/yr) representing some 35% of the Borough total. Notwithstanding the different time periods, the scale and proportion of housing planned for Loughborough and Shepshed would be broadly in line with that planned for in the submitted Core Strategy.
150. I am satisfied that the Council has considered reasonable alternatives for the location of a SUE in the north of the Borough focussed on Loughborough and Shepshed and has reached a justifiable conclusion in respect of the merits of the alternatives. The potential to accommodate significant development to the south of Loughborough is limited by the need to avoid coalescence with the settlements of Quorn and Woodthorpe and environmental constraints. To the south west of Loughborough development potential is limited by landscape constraints and the proximity of the Charnwood Forest Regional Park. The option of a SUE west of Shepshed would have a significant landscape impact and be remote from Loughborough.
151. The option of a SUE at Cotes to the east of Loughborough would entail development being separated from the urban area of Loughborough by the wide valley and floodplain of the River Soar, limiting scope for physical links and integration with the existing urban area. There were also concerns regarding the deliverability of a SUE of an appropriate scale in this location due to the significant road improvements necessary.
152. The Council also considered the option of substantial development at Wymeswold which was proposed through public consultation. This would effectively be a new settlement, remote from the urban area. It would require substantial and costly road improvements and have significant adverse impacts on the landscape and the character and setting of rural settlements.
153. All of the options for a SUE would have some impact on heritage assets and their settings. In the case of land at Cotes, these include a Scheduled Monument (the deserted medieval village at Cotes) and Historic England⁶ considers that substantial harm would occur and that there are no opportunities for mitigation⁷.
154. As I have explained above, the scale of development proposed is necessary to ensure an adequate and flexible supply of housing for the plan period and to deliver the strategy of urban concentration. It will also enable employment opportunities and key infrastructure and social and community facilities to be brought forward comprehensively as part of the development.

⁶ On 1st April 2015 English Heritage separated into Historic England and the English Heritage Trust – Historic England deals with planning matters

⁷ Confirmed in PSD/36 and at the hearing session

155. The proposed site boundary for the SUE West of Loughborough includes Garendon Park, a Grade II Registered Park and Garden. This contains a scheduled monument and 13 listed buildings. These include the Grade I listed Triumphal Arch and Grade II* listed Temple of Venus along with a number of Grade II listed buildings and structures. Garendon Park, the Triumphal Arch and the Temple of Venus are on the national heritage at risk register.
156. The intention is that built development will be located to the north of Garendon Park although the proposed strategic distributor road would pass through it close to the junction of the M1 before linking up with the A512⁸.
157. Policy CS22 sets out criteria relating to the protection of and mitigation of impacts on historic and archaeological features, the provision of public access and the restoration and long term management of the Registered Park and Garden.
158. Historic England had originally raised serious concerns over the proposal in their representations on the Pre-Submission Draft of the Core Strategy. These related to the process of considering and selecting options for the location of a SUE, the extent of evidence on the potential impact on heritage assets, the harm due to the proximity of housing development to the Registered Park and Garden and the road passing through it and the appropriateness of proposals for restoration, long term management and public access. At that stage Historic England took the view that substantial harm would be caused to the significance of the heritage assets.
159. Historic England was subsequently involved in discussions with the Council and the promoters of the proposal. Detailed work was undertaken in relation to the planning application for the SUE and the Council produced a detailed heritage appraisal. A number of potential modifications to the Core Strategy were also discussed and agreed. On the basis of this additional work and discussions, Historic England is now satisfied that the site selection process was justified and that sufficient evidence exists in relation to the significance of the heritage assets and the potential impact of development on them. Subject to the agreed modifications to the Core Strategy, it now considers that there would be less than substantial harm to the significance of the heritage assets. Statements of common ground were submitted to that effect⁹.
160. An important aspect of the significance of Garendon Park, and the individual buildings and structures within it, is the open, rural landscape setting which remains largely intact to the north. The proposed SUE would bring about substantial change to the character and appearance of this area. The currently open, agricultural land would become largely urbanised. Whilst the impact would be mitigated to some extent by buffers of green space and additional planting, there would still be an adverse effect on the setting of the heritage assets.
161. The strategic distributor road would result in the physical loss of historic parkland along its length and the separation of an area between the road and the M1 from the rest of the parkland. It would also affect the setting of the

⁸ As shown on concept masterplan p121 of submitted Core Strategy

⁹ PSD/32 and PSD/36

Triumphal Arch, the Temple of Venus and the Grade II listed White Lodge. Although the impact of the road could be mitigated to some extent by sensitive design, sympathetic to the historic parkland setting and by ensuring that it follows a route as close as possible to the M1, there would be an adverse effect.

162. On the basis of discussions and suggested modifications Historic England considers that subject to appropriate safeguards, the proposals for restoration of the parkland landscape and historic structures and proposals for public access would not have an adverse effect on the significance of the heritage assets. In fact it considers that there would be heritage benefits through restoration. I share this view.
163. Shepshed and Hathern Conservation Areas are both well contained within their respective built up areas and some distance from the SUE. I consider that the SUE would not adversely affect these Conservation Areas or their settings.
164. In overall terms, whilst there would be some adverse impact on designated heritage assets and their settings, I consider that subject to appropriate mitigation, this would constitute less than substantial harm to their significance. Having regard to the statutory duties relating to the preservation of such assets, I have given this harm considerable importance and weight.
165. However, the proposed SUE would provide a substantial number of new homes, making a critical contribution to the overall supply of housing land in the Borough. It would provide significant amounts of affordable housing, along with employment land and social and community infrastructure. The SUE would support jobs in construction and the wider supply chain, increase expenditure and economic activity in the area and provide funds through the New Homes Bonus. It would enable the restoration and long term management of the parkland landscape and historic structures and the introduction of public access for the first time. Taking all of this into account I consider that the proposed SUE would deliver very substantial public benefits. I conclude that the harm to the significance of the heritage assets would be outweighed by these public benefits.
166. Policy CS22 requires a range of transport mitigation and improvement measures including a strategic distributor road through the site, dualling of a stretch of the A512 up to Junction 23 of the M1, capacity improvements at Junction 23 and improvements to public transport, pedestrian and cycling links. As Highway Authority, Leicestershire County Council has undertaken a thorough and robust assessment of the transport implications of the SUE (including in respect of the planning application) and is satisfied that adequate mitigation can be put in place. The Highways Agency has confirmed in respect of the planning application that subject to conditions and improvements to Junction 23, it has no objections to the proposal. There would be scope to review transport mitigation measures as the development of the SUE progressed. I am satisfied on the basis of available evidence that the effects of the SUE on traffic and transport can be adequately mitigated.
167. Development on the scale proposed will clearly change the character and visual appearance of the area, resulting in an urbanisation of the countryside. It will significantly extend the built up area of Loughborough to the west and

north-west, reducing the gaps between Loughborough and Shepshed and between Loughborough and Hathern. However, it is intended that built development will sit below the ridgeline south of Hathern and the SUE will incorporate substantial areas of green space and additional planting. A clear separation between Loughborough and Hathern would be retained. The M1 would continue to provide a significant physical barrier between Loughborough and Shepshed. The retention of Garendon Park as a substantial area of undeveloped land, along with areas of green space around the periphery of the SUE would reinforce the sense of separate identity and avoid coalescence.

168. There are no nationally or internationally designated nature conservation sites within or close to the SUE. There are two Local Wildlife Sites within the SUE and a number of wildlife corridors run through it. Policy CS22 sets out clear safeguards in terms of the protection and enhancement of biodiversity. Adequate safeguards are also set out in relation to minimising flood risk. Whilst there would be some limited loss of the best and most versatile agricultural land, this would be outweighed by the significant benefits of the proposal.
169. I appreciate the strong concerns of local residents, community groups and other organisations over the proposed SUE. However, Policy CS22 and other policies in the Core Strategy provide clear mechanisms for mitigation and safeguards in terms of the potential effects of the development. The SUE will bring with it substantial benefits which I consider outweigh any residual harm following mitigation.
170. Policy CS22 (in association with Policy CS3) provides a justified and sufficiently flexible approach to affordable housing provision as part of the SUE.
171. As with the proposed SUE North East of Leicester, the development of such a large site over many years will undoubtedly be a complex process which will require careful planning. The proposed SUE brings with it significant infrastructure requirements and associated costs and a number of detailed issues will need to be resolved. However, I am satisfied that there are no insurmountable physical or other constraints and that mechanisms can be put in place to ensure that necessary infrastructure is provided at the appropriate time as the development progresses. There is clearly strong interest in developing the site, and proposals are well progressed. I am satisfied that the SUE would be viable and realistically deliverable.
172. However, taking account of progress to date and the scale of the proposal, I consider it unrealistic to expect the first housing completions on the site in 2015/16 as envisaged in the submitted Core Strategy. The Council acknowledged that this was the case and indicated that it was now in fact likely that the first completions would take place in 2016/17 with only a modest level of completions in the first year. The result would be a slight reduction in anticipated completions in the plan period. Although this remains optimistic, I consider it to be a realistic scenario. Main modification MM14 would amend the figures accordingly.
173. In addition, main modification MM14 would amend the concept masterplan in respect of the route of the strategic distributor road and provide necessary clarity and safeguards in terms of the effects on heritage assets and

mitigation. Historic England confirmed that the main modification would address their concerns in respect of the proposed SUE.

174. This main modification would also provide necessary flexibility in terms of the size of the site for Travelling Showpeople and the size of retail units within the proposed local centre. In addition it would clarify the relationship between the site boundary on the Policies Map and the concept masterplan included in the Core Strategy for illustrative purposes and amend the boundary to clarify that the SUE does not extend into North West Leicestershire.
175. Taking all of the above into account I consider that subject to main modification MM14, the West of Loughborough SUE proposed in Policy CS22 is justified, effective and consistent with national policy.

Issue 13 – Whether the extension to the Science and Enterprise Park proposed in Policy CS23 is justified, effective and consistent with national policy

176. Policy CS23 proposes an extension to the Loughborough Science and Enterprise Park. The existing Science and Enterprise Park has been developed over a number of years and provides a base for a range of businesses associated with the University's own activities and the wider research and development sector. It provides high quality and high value employment and is a key element in the local and sub-regional economy. It has a particular role in terms of business start-ups and innovation. The Science and Enterprise Park has proved successful with very high levels of occupancy. Evidence supports the need for further expansion of the Science and Enterprise Park and I consider that this would bring substantial economic benefits.
177. The policy seeks to ensure a high quality development providing for specialist uses associated with the University, research and development and the knowledge based sector. It is anticipated that Phase 3 of the Science and Enterprise Park would be developed in the plan period. Whilst this would cover 35ha in total, the policy requires 40% of the site to be retained as green infrastructure. This would provide for some 21ha of development in a very well landscaped setting. Phase 4, which would allow for some 25ha of development on a site of 42ha (again with 40% green infrastructure), gives flexibility and provides a clear basis for the long term development of the Science and Enterprise Park beyond the plan period.
178. I consider that the proposed extension to the Science and Enterprise Park is justified in principle and that there would be clear mechanisms through planning controls and the University's continued management to ensure that it provides for specialist businesses and does not accommodate more general employment uses which are well provided for elsewhere. I am satisfied that it is realistically deliverable.
179. Subject to the addition of specific reference to the need to protect the setting of heritage assets including Garendon Park, I consider that Policy CS23 provides adequate safeguards and mitigation in terms of the potential impacts of the proposed development, including those arising from additional traffic.
180. Policy CS23 lacks sufficient clarity in terms of the approach to ancillary uses and main town centre uses and in terms of the evidence base to support a

development framework. It also lacks sufficient flexibility with regards to the amount of floorspace to be accommodated in the various sectors.

181. Main modification MM15 would address these concerns and ensure that the need to protect the setting of heritage assets including Garendon Park is set out clearly. Subject to this main modification the extension to the Science and Enterprise Park proposed in Policy CS23 is justified, effective and consistent with national policy.

Issue 14 – Whether the Shepshed Direction of Growth proposed in Policy CS24 is justified, effective and consistent with national policy

182. A Direction of Growth adjacent to Shepshed is proposed in Policy CS24. It was intended in the submitted Core Strategy that this would accommodate at least 500 new homes by 2028 (in addition to existing commitments at the time). As explained above, I consider that the strategy of focussing development in the north of the Borough on Loughborough and Shepshed is sound.
183. Following the submission of the Core Strategy, a number of planning applications for housing were approved (or approved subject to s106 agreements) at Shepshed. The scale of commitments at Shepshed subsequently increased significantly, particularly between April and November 2014. As of November 2014 there were commitments for some 1,270 homes.
184. Taken together with commitments in Loughborough and the proposed West of Loughborough SUE, this is already sufficient to ensure that overall housing requirements are met with some flexibility and that the development strategy is achieved. In this context there is no need to promote additional strategic growth at Shepshed beyond existing commitments.
185. In light of this, I consider that the proposed Direction of Growth at Shepshed is no longer justified. It is not necessary under the circumstances for me to address other detailed matters of soundness. Main modification MM16 would delete Policy CS24 and remove references to the Direction of Growth from the Core Strategy. Along with main modification MM1 it would also clarify the situation regarding housing provision and commitments at Shepshed and ensure that the Core Strategy reflects up to date evidence. These modifications are necessary for the Core Strategy to be justified, effective and consistent with national policy in this respect.

Issue 15 – Whether other policies are justified, effective and consistent with national policy

186. Policy CS4 sets out a justified approach to houses in multiple occupation. However it fails to explain clearly that detailed policy requirements will be reviewed and set out in the SA and DM DPD. Main modification MM3 would address this concern.
187. Main modification MM7 is required to ensure that Policy CS10 is sufficiently flexible in terms of the amount of employment land at Service Centres.
188. Whilst Policy CS12 sets out a justifiable approach to green infrastructure, the Key Diagram lacks clarity in that it does not show the location of Green Wedges. Main modification MM8 would address this concern.

189. Main modification MM9 is required to ensure that Policy CS15 is fully consistent with national policy in respect of the protection of open space, sport and recreation facilities.
190. Policy CS16 sets out criteria to assess proposals for all renewable energy developments. This is no longer consistent with national policy on wind energy as set out in the Written Ministerial Statement published on 18 June 2015. Main modification MM21 would address this concern.
191. The Loughborough Inner Relief Road has been constructed and main modification MM10 would ensure that Policy CS18 reflects this up to date situation.
192. There is a need to ensure that Policy CS25 reflects the Council's up to date position on the introduction of a Community Infrastructure Levy Charging Schedule, clarify the status of the Infrastructure Schedule set out in Appendix 2 and make it clear that this will be kept under review. Main modification MM17 would address these matters.
193. Subject to these main modifications, the above policies and others in the Core Strategy are justified, effective and consistent with national policy.

Issue 16 – Whether the Core Strategy would be able to be monitored effectively

194. The Council accepted that Appendix 3 does not set out a sufficiently clear and effective monitoring framework. Main modification MM19 would replace the monitoring framework, ensure that indicators relate to key policy aims and that the targets are relevant to these indicators. It would also enable more responsive monitoring over shorter time periods, provide baseline data where appropriate and reflect other modifications set out above. Subject to this main modification the Core Strategy will be able to be monitored effectively.

Assessment of Legal Compliance

195. My examination of the compliance of the Core Strategy with the legal requirements is summarised in the table below. I conclude that the Core Strategy meets them other than in terms of setting out which policies from the Borough of Charnwood Local Plan will be superseded by policies in the Core Strategy. Main modification MM20 would rectify this.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Core Strategy is identified within the approved LDS (April 2013) which sets out an expected adoption date of October 2014. Although there has been slippage in the timetable for adoption due to the suspension of the examination, the content of the Core Strategy is compliant with the LDS.
Statement of Community Involvement (SCI) and	The SCI was adopted in January 2006 and consultation has been compliant with the

relevant regulations	requirements therein, including the consultation on the post-submission proposed main modifications (MM)
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report (March 2013) sets out why AA is not necessary.
National Policy	The Core Strategy complies with national policy except where indicated and modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act (as amended) and 2012 Regulations.	The Core Strategy complies with the Act and the Regulations other than in terms of setting out which policies from the Borough of Charnwood Local Plan will be superseded by policies in the Core Strategy. Main modification MM20 would rectify this.

Overall Conclusion and Recommendation

196. The Core Strategy has a number of deficiencies in relation to soundness and legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.
197. The Council has requested that I recommend main modifications to make the Core Strategy sound and legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Charnwood Local Plan: Core Strategy satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the NPPF.

Kevin Ward

INSPECTOR

This report is accompanied by the Appendix containing the Main Modifications

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