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From: [REDACTED]
Sent: 05 December 2017 14:19
To: _WEB_Local Plan
Subject: issues and options consultation response
Attachments: WWT issues and options letter 05.11.17.docx

Good afternoon

The Wildfowl & Wetlands Trust (WWT) is keen to engage with the development of the next local plan for Stroud. Please find a letter attached in response to the issues and options consultation paper.

Kind regards

[REDACTED]

Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud
GL5 4UB

5th December 2017

Dear Sir / Madam

I am writing on behalf of the Wildfowl & Wetlands Trust (WWT) in response to the issues and options consultation paper. WWT is a leading wetland conservation charity with nine visitor centres across the UK and a membership of over 200,000. Our most popular visitor centre, and headquarters, is located at Slimbridge and attracted more than 280,000 visitors in 2016. We are keen to engage with the review of the current local plan for Stroud and hope that you find our comments useful at this early stage.

Question 1.0a - *What are your priorities for Stroud District? Can you list your top 5 issues, challenges or concerns for the next Local Plan? You could pick five from our list of 40... Or tell us if we have missed something.*

Protecting and enhancing the natural environment in Stroud is an important part of delivering high quality places where people want to live. We urge this to be better reflected in the next local plan. Therefore, we welcome the section on the environment in the key issues part of the consultation paper and all of the important issues listed therein. In particular, we support issue number 19 that highlights the need to conserve and enhance Stroud's countryside, landscape and biodiversity as well as maximise the potential for a green infrastructure network. However, the consultation paper misses a number of opportunities to raise key issues around the natural environment.

The key issues part of the current local plan lists a number of environmental issues that should be brought forward to the next plan and potentially expanded upon. For instance, issue 8 in the current plan identifies a requirement to consider how housing needs can be met without compromising the high quality environment that exists in Stroud. This statement sends a clear message on the value of high quality environment and we recommend taking this forward as a key issue in the next plan. Similarly, issue 20 in the current plan raises important concerns around the impact of modern farming practices on the quality of the environment in Stroud and we recommend including this issue in the next plan too. Generally, the current plan discusses the natural environment in far greater detail than the consultation paper does in terms of key issues. Specifically, we suggest that

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much of the detail found in issues 71-77 of the current plan is included in the key issues part of the next plan.

Incidentally, issues 71-73 of the current local plan discuss the abundance of nationally and internationally protected wildlife sites in Stroud and rightly identifies a need to protect and enhance them. However, judging by data returned to the government on local sites in positive conservation management, Stroud appears to be struggling to achieve this. In fact, the data shows that the proportion of local sites in positive conservation management has fallen year on year, from 56% in 2013 to 48% in 2017¹. We suggest that the next local plan for Stroud contains stronger policies on protecting and enhancing local wildlife sites in order to reverse this trend.

There is also an opportunity to improve the next local plan by putting more emphasis on enhancing the Nature Improvement Areas (NIAs) designated by the Gloucestershire Local Nature Partnership. Two of the four NIAs in Gloucestershire, namely Severn Vale and Cotswold Scarp, fall largely in Stroud and carry great potential to deliver multiple benefits through active conservation work. For instance, there is an opportunity within the Severn Vale NIA to create a major wetland reserve south of Gloucester with the potential to become a major attraction for people and wildlife².

While it is important to focus on protecting and enhancing designated sites and areas, the plan should also safeguard and enrich the wider natural environment in Stroud. Issue 77 in the current local plan identifies a need to address knowledge gaps about habitats and species on non-designated and un-protected sites in Stroud in order to provide a baseline against which future change can be measured. It is unclear as to whether or not these gaps have been filled since the plan was published but it is certainly an important piece of work. If sufficient data has now been collected, it should be used to inform targets for improving biodiversity in the next plan. If the gaps still exist, the need to fill them should be raised as a key issue in the next plan.

The current local plan states that Stroud is a 'rural' district with a 'high quality environment' and this should be reflected in the policies of the new plan. There is a real opportunity for Stroud to build on its 'strong green scene' with its next plan and become a national leader in protecting and enhancing the natural environment.

Question 1.0b - *Do you have ideas and suggestions for how the Local Plan might tackle particular issues?*

¹ See multiple 'Gloucestershire Local Sites Data Summary' documents at <http://www.gloucestershirenature.org.uk/publications/index.php>

² See 'Nature Improvement Areas in Gloucestershire (August 2016)' at <http://www.gloucestershirenature.org.uk/publications/index.php>

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Sustainable drainage systems (SuDS) could tackle a range of issues across Stroud. SuDS seek to manage rainfall in a similar way to natural processes, using landscape to control the flow and volume of water, while soil and plants filter pollution along the way. If SuDS are designed and managed appropriately, they can also be used to deliver multiple benefits such as reduced flood risk, better water quality, improved biodiversity, better health and wellbeing and more spaces for outdoor learning. Therefore, SuDS could be used in Stroud to help tackle multiple issues from multiple sections of the consultation paper.

The strength of SuDS policy in local plans is an important factor affecting the number and quality of schemes built in a given area. The current local plan for Stroud makes a number of strong statements on SuDS through its policies. Policy ES4, for example, states that new development shall incorporate SuDS in accordance with national standards; policy CP5 states that proposals for strategic sites will need to show how they meet a range of objectives including incorporating SuDS; and policy E14 states that development on existing employment sites in the countryside will be expected to include measures such as SuDS. These policies, as well as statements on SuDS in other policies such as CP11, CP14 and the site allocation policies, must be carried forward into the next plan.

There are a number of opportunities to build on current SuDS policy in the next local plan in order to provide a robust line on SuDS and clarity to planning officers and developers:

- Firstly, a stand-alone policy on SuDS would help to push the requirement up the agenda and create a space in which to set out detailed requirements. Such a policy should:
 - **Promote the delivery of multiple benefits** – SuDS carry the potential to deliver multiple benefits and help tackle many issues across Stroud but they must be designed and managed appropriately. Adding a requirement for SuDS to deliver multiple benefits such as better water quality, improved biodiversity and better health and wellbeing would help realise the full potential of SuDS. Policy IN8 in the [Dumfries and Galloway Local Plan](#) achieves this in part by stating that SuDS should contribute positively to the biodiversity and general amenity of the area.
 - **Encourage the retrofitting of SuDS** – Pushing SuDS in new development is important but such development only represents a tiny fraction of the total urban landscape in Stroud. While policy ES4 in the current plan does mention retrofitting of existing development, it is not promoted particularly well or explicitly linked to SuDS. Policy LP14 in the [Fenland Local Plan](#) does this well by stating that the use of SuDS will be required to secure greenfield runoff rates for previously undeveloped sites and for developed sites. We also recommend the use of Section 106 funding to assist in retrofitting SuDS onto public land and buildings such as schools.

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- **Require SuDS in minor developments** – As the law only requires SuDS to be fitted in developments of 10 or more properties, they are often omitted from smaller developments. Building minor developments without SuDS can put a strain on neighbouring major developments and represent a missed opportunity to deliver multiple benefits when they accumulate. Again, policy IN8 in the [Dumfries and Galloway Local Plan](#) achieves this in part by stating that SuDS will be required in all development with the exception of single houses and those with direct discharges to coastal waters.
- Secondly, incorporating the definition of sustainable drainage as given in Schedule 3 of the Flood and Water Management Act 2010 into the next local plan would help to clarify exactly what a SuDS scheme is expected to achieve.
- Thirdly, it would also be worth providing more background information on SuDS in the next plan. This could include the rationale behind using SuDS in development, a description of the different types of SuDS that could be used and links to further information on SuDS such as [CIRIA's SuDS manual](#) and [RSPB/WWT's SuDS guidance](#).

SuDS would be particularly useful for addressing issues in urban parts of Stroud but, as the [Stroud RSuDS project](#) has found, they can also play an important role in more rural areas. The Environment Agency has recently [summarised](#) the latest evidence for a wider range of natural flood management techniques that could be put to use in rural Stroud.

If you have any questions about our responses or would like to discuss any of our suggestions further please do not hesitate to contact us.

Yours faithfully

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Government Affairs Research Assistant, WWT