

[REDACTED]

From: [REDACTED]
Sent: 05 December 2017 15:14
To: WEB_Local Plan
Cc: [REDACTED]
Subject: Stroud District Local Plan Review: Issues and Options Public Consultation
Attachments: dps1.pdf

Please find attached our comments in response to the Issues and Options public consultation received on 11 October 2017.

Kind regards

[REDACTED]

Planning Advisor
Sustainable Places
Shropshire, Herefordshire, Worcestershire and Gloucestershire
Environment Agency – West Midlands Area



[REDACTED]

[REDACTED] / Team email: shwgplanning@environment-agency.gov.uk

[REDACTED] Riversmeet House, Newtown Industrial Estate, Northway Lane, Tewkesbury, Gloucestershire, GL20 8JG

Please note: the Environment Agency have updated their climate change allowances for planners. See [Flood risk assessments: climate change allowances](#).

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else.

We have checked this email and its attachments for viruses. But you should still check any attachment before opening it.

We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Click [here](#) to report this email as spam

██████████
Stroud District Council
Planning Policy
Ebley Mill (Council Offices)
Westward Road
Stroud
Gloucestershire
GL5 4UB

Our ref: SV/2010/104083/CS-
09/PO1-L01

Your ref:

Date: 05 December 2017

Dear ██████████

Stroud District Council - Local Plan Review - Issues and Options Paper

Thank you for consulting us on the Stroud District Council Local Plan Review 'Issues and Options Paper', which was received on 11 October 2017.

As you are aware we have worked closely with your Authority to help influence the current Local Plan (LP), adopted in November 2015, and welcome the opportunity to provide further comments as part of the review process.

We have set out our comments below in the order the chapters appear in the consultation Document. In addition, whilst we acknowledge that no specific policies have been outlined as part of this consultation paper, we have had an initial look at the some of the relevant policies in the current LP and have provided general comments or recommended changes which we would like to be encouraged as part of any emerging policies/the revised plan.

1. Key Issues

We understand the key issues set out on pages 5-9 build on those set out in the current LP and are based on your Authority's five Key Priorities. We have not identified a 'top five' as many of the key issues are important to the Environment Agency. With respect to the four priority areas you have identified for the review to address, we wish to make the following comments:

Environment:

Key Issue 19 - Whilst this relates to issues such as open space it is felt that it should be able to encompass the establishment of a linked river corridor (similar to that for the canal restoration) that includes the watercourses as a focal point of new development where present.

Key Issue 25 – Whilst we welcome the inclusion of this point, we would suggest it be re-worded to the following:

'Providing resilience to flood risk by working with partners to investigate opportunities for flood risk management improvements to improve resilience to flood risk, support suitable release of regeneration sites where possible and invest in flood risk management projects which provide multi- functional benefits directly on and off site'

Key Issue 26 – Similar to the above but focused more on environmental improvements, this could also tie back into key issue 19. We would suggest this could possibly be slightly amended as follows;

'Developing strategies and actions to avoid, reduce and mitigate the impacts of development, ensuring steps to enhance the natural environment are taken wherever possible'

Environment Agency
Riversmeet House, Newtown Industrial Estate, Northway Lane, Tewkesbury, Gloucestershire, GL20 8JG.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

Delivery:

Key Issue 37 – Continuing to ensure that the Cotswolds Canals restoration plays a positive role in the District needs to ensure that restoration of the remaining phases optimises the enhancement of a joint river and canal corridor and adverse impacts on the river Frome are adequately mitigated. This includes the implications of the water resources requirements of the canal as well as physical impacts or development in close proximity to it. There are significant floodplain habitat restoration and creation opportunities - wet grassland/reedbed/fen/ponds in conjunction with restoration of phase 1b of the Stroud water canal. Funding shortfalls may be an issue for delivery.

Key Issue 40 – Could also include local community flood schemes in this section as this may help funding opportunities, as follows:

‘Developing mitigation and enhancement strategies to fund environmental projects’.

Is there also the opportunity to include the following type of key issue probably in the delivery section?

‘Fostering an integrated approach to infrastructure planning and delivery, bringing together partners around growth settlements, to align needs, resources and maximise infrastructure delivery for residents, businesses and the environment’.

Furthermore, Key Issue 40 could be expanded to include “Developing mitigation strategies to fund environmental projects *and avoid, reduce and mitigate the indirect impacts of development on the natural environment*”. This could include a funded river restoration strategy that would link with Key Issue 19, 26 and 32. With regards to the latter (green infrastructure network) we would advocate that this includes meaningful measures to improve environmental quality in addition to access infrastructure such as retrofitted SUDS and river enhancement measures.

2.2 Our Town Centres

We are aware through data we hold that there is a particular concentration of properties (residential and non-residential) at existing flood risk in Nailsworth (circa 251 properties) and Stonehouse (circa 322 properties in the Downtown Road area). As well there are also additional pockets of existing properties at risk in Stroud and Dursley. We would therefore suggest that the opportunities listed for improving these town centres should include:

- *Better integration of infrastructure improvements to deliver measures to reduce the threat of flooding to existing residents and businesses.*

3.1 Future Growth Strategy

This section sets out the four different options for distributing future growth within the district. Whilst we would not particularly advocate one option over another (1-5), we would reiterate the importance of developing the best option based on the results of the relevant updated evidence base documents.

From a flood risk perspective however, it may be that a slightly dispersed strategy is more beneficial in reducing pressures on existing under-utilised brownfield sites to provide truly sustainable developments in relation to scale that comfortably meet all of the key issues. This strategy may also provide wider-scale benefits by enabling new development to help resolve existing localised issues that currently do not qualify for appropriate funding, perhaps due to scale, and also contribute to catchment-wide benefits.

The specific locations listed within (Broad Locations and Potential Sites) all highlight the floodplain as one of the primary physical constraints where this occurs which is welcomed, thus putting this issue to the fore when considering development areas.

As previously stated we would caution that it is important to base the emerging spatial
Cont/d..

vision and master planning on the evidence base documents you have undertaken and which are in the process of being undertaken.

In response to the questions raised in section 3.2a, from a flood risk and ecological protection and enhancement perspective we would provide the following comments on the broad locations. (Below that, we have also set out under environmental headings comments about constraints and opportunities for the development of the District generally as well as the emerging allocations.)

FLOOD RISK AND ECOLOGICAL PROTECTION AND ENHANCEMENT

3.2 Gloucester Southern Fringe

Opportunities to provide flood risk solutions can be delivered through encompassing drainage elements within wider infrastructure delivery. For example, other infrastructure necessary to support growth such as strategic and local highway works and new school provision can include drainage elements which collectively provide flood risk benefits. An integrated approach to infrastructure delivery should therefore be pursued which brings together resources for infrastructure delivery and maximises the benefits that can be achieved.

G2 (Whaddon) – will provide opportunities for additional flood risk management and improvements to the downstream Daniels Brook Flood Alleviation Scheme (FAS) as there may be opportunities to complement the existing FAS to provide greater resilience in this area. In addition there are opportunities for environmental improvements (river restorations and retrofitting of M5 drainage runoff). It will allow Gloucester City, Gloucestershire County and Stroud District Councils in conjunction with the Environment Agency to work in partnership as Flood Risk Management Authority's (FRMA's) with other key organisations such as the Highways Agency.

G3 (South west of Brockworth) – will allow for opportunities in improving flood risk management on the Shorn Brook and potentially some ecological opportunities.

3.3 South of the District

Our existing communities at risk data does highlight two areas in Sharpness with a clustering of existing properties at flood risk. There may be opportunities to address this through growth in this location, developing a place based infrastructure approach which seeks to better integrate infrastructure improvements and include measures to reduce the threat of flooding to existing residents and businesses within this locality.

3.4 Settlement Hierarchy

We note the commentary and question posed at 3.4. regarding whether the settlement hierarchy should take account of environmental constraints. We would be supportive of some consideration of environmental constraints in relation to the settlement hierarchy. This appears to be a logical approach as constraints such as flood risk may mean that development opportunities are limited in some areas whereas others that may currently be less well served by infrastructure may present greater opportunity for increased growth. We would caveat the above by stating that infrastructure should be provided alongside housing and employment growth as this is an important factor in delivering sustainable development and mitigation and adaptation to climate change. One further observation on the settlement hierarchy is that given the scale of Huntsgrove, it may be more relevant if this were in tier 1.

3.5 Our Towns and Villages (Broad Locations and Potential Sites)

We understand as part of your Strategic Assessment of Land Availability (SALA) evidence base that those SALA sites identified with some future potential have already gone through an initial sifting using environmental constraints such as Land Contamination, Biodiversity and Flood Risk. We therefore acknowledge that the Flood Risk Sequential Test for some sites has already been undertaken and we welcome this.

Based on the information submitted in support of this consultation we have not undertaken a detailed constraints check of all the sites being considered. Therefore it is important to note that whilst we have considered those environmental issues within our remit, the following comments are not exhaustive. As previously stated the results of the relevant updated evidence base documents should be used to identify the most appropriate sites to be brought forward.

The Stroud Valleys

Brimscombe:

All the sites identified have flood risk issues, but there would be opportunities for re-establishing a green corridor and river restoration. According to data we hold up to 88 properties have been identified in this location that have some risk of flooding attached to them and hence the redevelopments within the valley bottom may allow for this risk to be reduced.

Site A - Brimscombe Mill:

There is a weir associated with a Mill pond. The removal of the weir in this instance is likely to lower water levels, therefore a technical fish pass may be a preferred option to pursue in conjunction with any redevelopment

Site B - Brimscombe Port/Bourne Mills:

There are two significant culverts of 80m and 90m respectively that we would wish to be opened up, not necessarily on the same alignment. There is at least one weir, the removal of which should be investigated as part of remodelling the site to facilitate development. Current development encroaches to the bank top of the river and there is a significant opportunity to enhance and expand the green corridor.

Site C - Dockyard Works:

The river corridor is currently very constrained at this location therefore any development should seek to enhance and expand the river corridor. A tributary of the river Frome runs north to south across the site in culvert which by opening it up presents an opportunity to restore habitat connectivity

Nailsworth:

Site C – may benefit from the outputs of the recently completed Nailsworth Stream hydraulic model due to be released in the New Year. Currently a handful of properties within the community are shown to be at risk and any redevelopment of this site could provide the opportunity to reduce this.

North Woodchester:

Site B – as above with a small number of properties currently at risk.

There is also at least one weir associated with the Mill and another structure upstream to the south of the site. The corridor is currently constrained and would therefore benefit from expansion and enhancement.

Stroud:

Site B2 – as above

Sites A & B – whilst there are potential significant environmental benefits to be gained on these sites (de-culverting) it is felt that the issue of flooding is significant and will severely

Cont/d..

restrict development opportunities. We have some concerns whether these sites could pass the sequential and exception test principles. However developments could reduce the risk of flooding to existing properties within the community especially downstream of site B2.

Stonehouse Cluster

Kings Stanley:

Site A – A number of existing properties are shown to be at risk and hence any development may afford the opportunity to reduce this risk. There is also a significant weir associated with Stanley Mills which is a key pinch point for fish movement on the southern arm of the Frome. The weir maintains levels in the upstream Mill pond and its removal or lowering is likely to compromise the historic context of the Mill. As part of any future development a technical fish pass is likely to be the most feasible option.

Site B - A small tributary of the Frome runs along the western boundary of the site and the eastern boundary of land to the rear of Borough close. In addition to flowing within a wooded wildlife and landscape corridor this tributary has been identified as having potential to attenuate some flow upstream of a local flooding hotspot.

Site D – This site is located mostly within the floodplain and is considered to provide very limited opportunities for future development. We are aware we have commented on a planning application for this site, Ref: S.15/2590/OUT (known as Brunsdons Yard). In this instance we were satisfied with the Flood Risk Assessment submitted, based on the proposed use and the proposed scheme for mitigation. We note however your Authority adopted a precautionary stance and refused the application in accordance with Policy ES4. In light of this whilst we recognising that the site is considered for employment uses only, from a flood risk perspective you may question whether the site should be included in the plan as more appropriate sites may be available elsewhere in the district.

Leonard Stanley:

A small tributary of the Frome runs through the centre of LE004. In addition to flowing within a wooded wildlife and landscape corridor this tributary has been identified as having potential to attenuate some flow upstream of a local flooding hotspot.

Stonehouse:

Whilst most sites have no direct impact on the floodplain (except for D1) there are a number of properties in Bridgend that are at a high risk of flooding and would benefit from any flood risk improvement works that can be provided upstream or in the direct vicinity. In addition there are opportunities for river restoration including the managed realignment of the Frome flood bank.

Site A - Is within the boundary of the Frome Key Wildlife site. A generous buffer zone should be retained to protect the integrity of the river/canal corridor.

Berkeley Cluster

Berkeley:

Sites A, B and C are all shown within the existing floodplain. Sequential Test required to demonstrate need for site location - steer elsewhere if possible (i.e. to north-east side rather than north-west of Berkeley). However, if no alternative, suitable riparian river-corridor should be provided to preserve floodplain / amenity / ecology consideration.

The Wotton Cluster

Kingswood:

We have no flood risk concerns for the proposed site allocations outside the floodplain. (Please note you should also seek the views of the Lead Local Flood Authority [LLFA] on other sources/non-fluvial flooding, and the SFRA Level 2 should investigate such sources further.) We agree with the rejection of site KIN002 in the floodplain. There may be potential to deliver upstream flood alleviation on Dyers Brook between Wotton-under-Edge and

Cont/d..

Kingswood, or upstream of Kingswood on Ozleworth Brook to reduce flood risk to areas in Kingswood (e.g. Vineyard Lane). The EA currently has no proposed scheme here due to a lack of justification for funding. Based on our latest modelling, there are a total 50 properties at risk in a 1:100 year flood event.

Wotton-under-Edge:

We have no flood risk concerns for the proposed site allocations outside the floodplain. We agree with rejection of site WUE006 in terms of the floodplain.

Aside from proposed housing development, new employment allocation areas should also consider flood risk (both existing and future). Any proposals within the coastal floodplain may justify a contribution towards future maintenance of EA flood defences (as requested with the previous proposal at the Severn Distribution Site, Saniger, Sharpness, SA5a).

All Other Sites

For all other sites where the floodplain may partially impact, this has been identified as a physical constraint in the document, which is welcomed. However further work in the form of the SFRA Level 2 will be required to understand flood risk affecting sites in more detail.

We also take this opportunity to comment on fish as developments proposed close to watercourses can offer opportunities for ecological enhancements. The functional habitat required by the majority of migratory fish in order to complete their life cycles are upstream of the Severn Estuary designated site boundary. In order to restore designated fish species or features to favourable conservation status access to breeding grounds and spawning habitats needs to be restored throughout the hydrological catchment of the Severn and particularly at key watercourses such as the Frome and the Little Avon which have significant potential, including high quality spawning gravels, for sea and river lamprey salmon and sea trout and eel. Other tributaries that flow into the Severn via the Gloucester Sharpness Canal such as the Cam and Shorn Brook are less relevant but still critical for fish and the endangered European eel. These comments may be relevant for all the development locations, as well as for consideration in the Habitats Regulations Assessment process.

WATER QUALITY AND THE WATER FRAMEWORK DIRECTIVE (WFD)

The WFD sets a target of achieving 'good status or good potential' in all water bodies by 2015 (in some cases this can be delayed to 2021 or 2027 such as on the grounds of disproportionate cost or technical feasibility), and there must be no deterioration in the existing status of water bodies.

Future development needs to be planned carefully so that it does not result in deterioration or further pressure on the water environment and compromise WFD objectives. Failure to comply with WFD requirements may lead to the European Commission bringing legal proceedings against the UK. Local Authorities have a general responsibility not to compromise the achievement of UK compliance with EC Directives.

The use of Sustainable Urban Drainage (SUDS) in all developments, and the removal of culverts and the naturalisation of watercourses where possible would all contribute to meeting WFD requirements.

Many waterbodies in the District are currently failing the WFD requirements as they do not yet meet the good ecological status required. We would highlight that both the river Frome (Ebley Mill to confluence with river Severn, WFD river water body reference GB 109054026550) and the (lower River Frome - Slad Bk to R Severn reference GB209054032450) are failing in part due to the impacts of physical modification including barriers to fish. In addition to morphological pressures, phosphate levels are impacted as a result of point source discharges, notably sewage discharge. Diffuse source pollution from

urban areas, transport and agriculture and rural land management can also contribute to damaging inputs and increase the risk of incidents and deterioration.

The Cam from source to the confluence with the Glos and Sharpness Canal WFD river water body reference (GB109054026550) is also of moderate ecological status for similar reasons as referenced above.

Sewage Treatment Capacity and the IDP: Sewage treatment capacity will need to be considered for all additional growth. We strongly recommend that the local authority continue to consult with the water companies to investigate available sewage infrastructure capacity, to identify any constraints and any required sewerage or sewage works improvements/upgrades. We anticipate that this will take place as part of the Infrastructure Delivery Plan (IDP) update that will be needed to deliver a sound Plan Review.

We have concerns about the adequacy of the current sewerage arrangements in Stroud that is causing foul flooding of properties, land and pollution of the river Frome. The particular areas of concern are Wallbridge, Dudbridge and Ebley Meadows. Major infrastructure improvements will be required to deal with the additional population growth and we understand Severn Trent Water are aware of the existing problems. The main sewage works serving the Stroud area is Stanley Downton.

Your Authority should also consider the likely timing of any required infrastructure to ensure that it is in place before development takes place to ensure that the water environment is protected. There should be no deterioration in water quality as a result of new development. Again the IDP will need to investigate this.

Environmental Projects and Partnership Working: The Environment Agency is already involved with environmental projects and partnership working for a range of environmental enhancements in the Stroud District. We would welcome any opportunities presented by the Local Plan Review to expand upon these and establish new projects and partnerships. For example as part of re-development allocated within the Plan itself or where mitigation and contributions are needed to facilitate new development.

Some examples of existing projects include various fish passage projects, the Sud/Twyver project, the Stroud Valleys Initiative and the Stroud Rural SuDS project.

Real gains have been made through these projects already. For example the Stroud Rural SuDS project has already delivered over 300 Natural Flood Management interventions to date including large woody structures, earth bunds, woodland planting, track drainage/culverts and soakaways. Projects have been undertaken in 18Km of watercourse and at least 21% of the Frome catchment now drains through Natural Flood Management structures.

Fish and Invertebrates: We would welcome the opportunity to work with the council and other key stakeholders including the Rivers Trusts and the Canal Partnership to include elements within a mitigation strategy to help address existing pressure and mitigate to impacts of proposed development with respect to the Habitats and Water Framework Directive.

We advocate the progressive reduction or modification of barriers to fish movement and migration from the confluence with the River Severn as far upstream as possible or practical to improve connectivity and ecological quality of an important tributary of the tidal river Severn for designated migratory fish and resident populations.

Between the Severn and Stroud, where its five tributaries converge a minimum of eleven weirs still need to be adapted to enable fish to access underexploited breeding and feeding habitat . Four have been modified to date, helping fish navigate around the third, fifth and sixth barriers from the Severn and feasibility has been undertaken for 3 other structures.

There is an appetite and a need to formalise the strategic implementation of a range of measures from simple easements and in stream habitat improvements to formal fish passes, including the two major impassable weirs at Fromebridge Mill and Whitminster weirs, at the bottom of catchment and a number of others including those at Ebley and Ryeford. In the rest of the catchment there are at least another 24 key barriers.

The optimum solution from a hydromorphological perspective is to remove weirs. Some locations will lend themselves to lowering weirs; at others a formal fish pass might be the only viable solution. A mitigation strategy could rank structures and locations with respect to historic and cultural constraints and potential flood risk benefit to inform work for sections of river to be restored as part of planned redevelopment and balance Industrial Heritage Conservation Area and the natural environment.

The native white clawed crayfish still live in some of the headwater streams of Stroud notably Painswick Stream and the Nailsworth Stream catchment therefore they should take priority for environmental improvements and species recovery work following plague outbreaks. This is likely to exclude fish barrier modification which could encourage the spread of non-native species.

PROTECTION OF GROUND WATER QUALITY AND QUANTITY

As previously highlighted, from a groundwater perspective, the LP needs to promote the protection of groundwater resources and re-development of Brownfield sites (contaminated land).

The potential impact on groundwater resources/ water environment including rivers from land-use redevelopment including Brownfield redevelopment sites will need to be considered as a part of the development process.

A large area of Stroud District stretching from Cam & Dursley in the south east, through Nailsworth and Minchinhampton, east of Stroud up to Whiteway is considered by the Environment Agency to be “restricted water available” in terms of groundwater abstraction licensing. The development plan areas of Amberley, Brimscombe, Chalford, Horsley, Manor Village, Minchinhampton, Nailsworth, Oakridge Lynch, Bisley-with-Lypiatt, Dursley and Uley fall within this area. Therefore, the availability of groundwater to supply any development may be limited and any water efficiency strategies should be identified and taken up by developers. The evidence base (Infrastructure Delivery Plan) will need to reflect and explore this issue as this may influence any relevant policy relating to water efficiency and resources.

In addition to groundwater resource constraints and potential historic contaminative uses of brownfield sites that will need to be considered during the development planning process, there are several authorised active landfills within the area including Colethrop Court Farm, Frampton, Woolgaston Farm, Standle Farm and Hampton Fields. There are also numerous historic landfills mainly concentrated in areas including Stroud, Nailsworth, Dursley, Berkeley and Frampton. Again consideration should be given to the location of these sites when considering development/re-development land because of the associated environmental impacts to both controlled waters and human health from such sites. Due to Stroud’s history of asbestos manufacture, some of these landfills may include asbestos.

We would caveat that the records we hold are never considered to be ‘complete’. Historic areas of refuse infill are often found on sites that otherwise appear undeveloped. Therefore your Authority needs to be aware of this when planning for future growth.

EVIDENCE BASE

4.1 Background Studies

We acknowledge this section has identified a number of major studies which either need updating or where necessary require the production of a new study.

From our perspective we have highlighted aspects of the evidence base that we consider will require further work/consideration as part of the LP Review. These documents are a requirement of the NPPF and we consider they are necessary to deliver a sound Local Plan Review.

Strategic Flood Risk Assessment Level 2 (SFRA)

As per our discussions with you to date, the current SFRA outputs used as part of the supporting evidence for the LP do not include the latest allowances for climate change, as included in the NPPG in February 2016. In addition there may be new data sources on flood risk from all sources (see comments below) since the original L2 SFRA was undertaken. Accordingly we consider the L2 SFRA needs to be updated to include the new sites being considered, new data available and the new policy and guidance relevant now (e.g. the new climate change allowances).

We are currently reviewing the outputs from the recently commissioned Nailsworth Stream Hydraulic Model which would supersede the outputs of the current SFRA. The hope is that if signed off by the end of his calendar year the outlines will be incorporated into our Flood Map for Planning within this financial year.

There is also a new hydraulic model for the Little Avon Catchment, the outlines are currently being incorporated into our Flood Map for Planning. The new SFRA L2 should include breach and overtopping scenarios as well as hazard rating mapping to inform emergency planners (safe access / egress for development).

Furthermore, there may be merit in the L2 SFRA including consideration of strategic and localised river restoration scenarios. This could include increasing capacity in-river and in the floodplain such as the potential and implications of removing, lowering or modifying weirs, opening culverts and by increasing stream length and cross sectional area. These measures can bring about ecological and WFD improvements as well as a reduction in flood risk.

It is important that a strategic approach is taken to ensure that as sites are redeveloped they can be planned in anticipation of potential measures up and downstream and future plans and projects for environmental improvements are not compromised or prevented.

Infrastructure Delivery Plan (IDP)

As indicated in earlier sections of this letter, we would expect sewage treatment capacity to be investigated in an update to the IDP that considers any new sites emerging. With regards to evidence base on water infrastructure, we would expect information on water quality and WFD to form part of the emerging evidence base, and the IDP would be a logical place for this evidence gathering to be undertaken.

Other evidence base documents

An updated Strategic Environmental Assessment should be incorporated as part of the required Sustainability Appraisal. In addition an updated Habitats Regulations Assessment (HRA) exercise will need to be undertaken. Natural England is the lead for HRA and we would advise you consult with it as the lead consultee. You may find our comments on WFD and fish in this response of use in consideration of the HRA process.

EXISTING LOCAL PLAN POLICIES

Whilst we acknowledge no new/revised policy wording has been included for comment as part of this consultation, we have taken the opportunity to review those current policies within the LP, and suggested any improvements/amendments where relevant.

Delivery Policy ES4

(Water Resources, Quality and Flood Risk)

In the second paragraph of the policy we recommend the following addition in recognition that the climate change guidance in the National Planning Practice Guidance (NPPG) has been updated in February 2016:

Applications will be supported by Flood Risk Assessments where appropriate that demonstrate the development will be safe for its lifetime when considering climate change

Currently the wording of the fourth and sixth paragraph refer to ground and surface water flooding only, we feel the wording should relate to all forms of flooding.

In recognition that our roles and responsibilities have changed regarding safe access and flood evacuation, we feel the third bullet point should also make reference to your Emergency Planners. We acknowledge however you may wish to discuss this with your Development Management colleagues as to current arrangements.

Where necessary, it is accompanied by a Flood Evacuation Plan in consultation with the Emergency Planners and Emergency Services;

Based on our experience of using policy ES4 over the last two years, we feel the element regarding watercourse corridors could be improved. Our starting point when working with developers is to incorporate a minimum 8m easement (measured from the top of bank) to any main rivers as this is the Byelaw distance and what we require from a flood risk management/maintenance perspective and is also a good minimum distance from an ecology perspective. However we've had some examples where developers have not been able to incorporate this and haven't considered it early enough in the process alongside other matters such as heritage. For this reason we wondered if it would be beneficial to state a minimum distance in the policy, or if that is felt to be too prescriptive, perhaps amending the policy as follows:

1) Conserve and enhance the ecological flood storage value of the water environment, including provision of generous easement areas along watercourse corridors

We note the supporting text at paragraph 6.27 regarding the Level 1 and 2 SFRA's. We would highlight that this text may need updating in due course once the Level 2 SFRA is updated. Also regarding the Level 1 SFRA, we understand it is unlikely that this will be updated across Gloucestershire as, whilst it is some years old now, the priority for Councils would be updating Level 2 SFRA's. We have no objections to this approach, but this is on the basis that the Level 1 SFRA is not the sole piece of information used to base the Sequential Test (ST) on. We would expect the ST process to use our Flood Map for Planning, the SFRA's, and any other data sets that hold relevant flood risk information. We would advise the supporting text is updated as part of the Plan Review to reflect this.

Delivery Policy ES6

(Providing for Biodiversity and Geodiversity)

We are supportive of the policy recommendations, but would wish to see reference being made specifically to fish at within the supporting text.

As stated above, these are initial comments only therefore we would expect to have a further opportunity to comment on any additional/revised policies which will be drawn up at future statutory stages of consultation as part of the Local Plan Review process.

I trust the above will assist in your preparation of the next stages of the Local Plan Review. We look forward to working with you further on the Local Plan Review, both at the Statutory Stages, and if our advice is sought outside of those stages as part of our Cost Recovery Service. Please do not hesitate to contact us if you have any queries at this stage.

Yours sincerely

[Redacted signature]

Planning Specialist – Sustainable Places

[Redacted line]

Team e-mail shwgplanning@environment-agency.gov.uk