

[REDACTED]

From: [REDACTED]
Sent: [REDACTED]
To: WEB Local Plan
Cc: [REDACTED]
Subject: Stroud Local Plan Review - National Trust response
Attachments: Stroud District Local Plan Review - National Trust response.docx
Importance: High
Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir/Madam

Please find attached the National Trust's formal response to the Stroud District Council's Local Plan review.

To reiterate our initial comment made in the response document, the National Trust is broadly supportive of the priority issues that have been identified, in particular the following two:

- Moving the District towards becoming Carbon Neutral by 2030, whilst adapting to the impacts of climate change and providing resilience for the future.
- Conserving and enhancing Stroud District's countryside and biodiversity, including maximising the potential for a green infrastructure network across the District

Having said that, it would be good to see a **stronger commitment to improving the condition of nature within the District**. References to 'conserving and enhancing biodiversity' have been used for some time now, yet the Lawton Report (Making Space for Nature, 2010) and the recent declarations of climate and ecological emergencies by many councils, suggest that more needs to be done going forwards.

The green infrastructure plan should be aligned with the emerging Gloucestershire Nature Recovery Network (NRN) (developed by GWT) to make sure new habitats are created in places where they make the most ecological sense and contribute to the Lawton principles.

The mechanism for delivering these sites should be a Biodiversity Net Gain policy (mentioned throughout the document) which will become mandatory in the coming years. This will require all developments to deliver a minimum 10% net gain in biodiversity, which can be delivered off site once the mitigation hierarchy has been followed (see P 186).

To be truly progressive, the local plan could allocate land for habitat restoration in a similar fashion to the way land is allocated for development. This should be guided by the NRN map so as to maximise biodiversity benefits.

We would welcome opportunity to discuss any points from our response.

Best regards



National
Trust



National Trust
Cotswolds
The Ebworth Centre, The Camp, Stroud GL6 7ES



The National Trust is a registered charity no. 205846. Our registered office is Heelis, Kemble Drive, Swindon, Wiltshire SN2 2NA. The views expressed in this email are personal and may not necessarily reflect those of the National Trust unless explicitly stated otherwise. This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify me immediately. If you are not the intended recipient of this email, you should not copy it for any purpose, or disclose its contents to any other person. Senders and recipients of email should be aware that, under the Data Protection Act 2018, the contents may have to be disclosed. The National Trust has scanned this email for security issues. However the National Trust cannot accept liability for any form of malware that may be in this email and we recommend that you check all emails with an appropriate security tool.

Stroud District Local Plan Review

Draft Plan for Consultation - November 2019

https://www.stroud.gov.uk/info/Draft_Plan_2019.pdf

Section	Sub-section	Comment
1. Setting the Scene Why do we need a plan?	Page 14 – Key issues Page 17 – Environment (also Page 22 - Vision)	<p>The National Trust is broadly supportive of the priority issues that have been identified, in particular the following two:</p> <ul style="list-style-type: none"> • Moving the District towards becoming Carbon Neutral by 2030, whilst adapting to the impacts of climate change and providing resilience for the future. • Conserving and enhancing Stroud District’s countryside and biodiversity, including maximising the potential for a green infrastructure network across the District <p>Having said that, it would be good to see a stronger commitment to improving the condition of nature within the District. References to ‘conserving and enhancing biodiversity’ have been used for some time now, yet the Lawton Report (Making Space for Nature, 2010) and the recent declarations of climate and ecological emergencies by many councils, suggest that more needs to be done going forwards.</p> <p>The green infrastructure plan should be aligned with the emerging Gloucestershire Nature Recovery Network (NRN) (developed by GWT) to make sure new habitats are created in places where they make the most ecological sense and contribute to the Lawton principles.</p> <p>The mechanism for delivering these sites should be a Biodiversity Net Gain policy (mentioned throughout the document) which will become mandatory in the coming years. This will require all developments to deliver a minimum 10% net gain in biodiversity, which can be delivered off site once the mitigation hierarchy has been followed (see P 186).</p> <p>To be truly progressive, the local plan could allocate land for habitat restoration in a similar fashion to the way land is allocated for development. This should be guided by the NRN map so as to maximise biodiversity benefits.</p>
	Page 17 – Health and wellbeing Page 46 – draft strategy on	The National Trust notes and supports the aim (on page 17) of developing a Green Infrastructure network of public open space provision throughout the District, to increase accessibility, ensuring public open spaces are adaptable and capable of accommodating

	green space etc	<p>multiple uses. The Trust also supports the intended delivery (on page 46) of “continued protection of identified areas of biodiversity, landscape, and heritage importance”, and “a mitigation strategy for the Cotswold Beechwoods SAC, to assess and address recreational pressures including from growth within Gloucester”.</p> <p>Overall, it is important that impacts on sensitive sites are avoided or mitigated, whilst new areas of public open space are created, particularly in less sensitive areas and in association with new housing.</p>
	Page 47 - * NEW * Core Policy DCP1 Delivering Carbon Neutral by 2030	The National Trust supports the aim for Stroud District to become carbon neutral by 2030, whilst also recognising the challenges of reducing car use in rural areas where alternatives (such as public transport) may not always be available.
3. Making Places Shaping the future of Stroud District	Pages 62-79 – The Stroud Valleys – various housing allocations	<p>The National Trust notes that several land allocations for housing are being proposed in the Stroud Valleys within 3km of Rodborough Common SAC. The SAC already lies in the most densely populated part of Stroud district, and there is evidence of recreational pressure, wear and tear. Therefore, it is important that the scale of new housing in this area is moderated, and that a robust approach is taken to avoid and mitigate potential impacts on the sensitive ecology of the SAC.</p> <p>Additionally (and in reference to Brimscombe Port), this development needs to have enough green space attached to it. It seems obvious that people housed or visiting this development will migrate up the hill to Minchinhampton and Rodborough for their recreation and the impacts of that must be minimised and mitigated or we will see further degradation of these internationally significant sites.</p> <p>The Rodborough Common Mitigation (Interim report 2015) strategy provides the framework for this internationally significant area.</p>
	Page 70 – The Stroud Valleys – Minchinhampton – PS05 East of Tobacconist Road	The National Trust welcomes the removal of potential development site PS04 (south of Cirencester Road Road, Minchinhampton). However, the Plan still includes site PS05 (east of Tobacconist Road, Minchinhampton), an allocation for 80 new houses. We previously objected to this and continue to have concerns. Minchinhampton lies in the Cotswolds AONB and adjacent to Minchinhampton Common. Traffic and additional volumes of cars across the common threaten the longevity of grazing into the future (cattle deaths from cars, etc). The grazing is essential to the management of the Commons, without which important habitats would be lost. The scale of new development at Minchinhampton should therefore be moderated, and its potential impacts reduced or mitigated. Any new housing should be an exemplar scheme in respect of its implications for ecology and landscape, and in terms of

		<p>sustainable travel (minimising car use).</p> <p>The National Trust and the Minchinhampton and Rodborough Commons Advisory Committee would welcome traffic mitigation measures over Minchinhampton common. Not only has the volume of traffic increased significantly in recent years, but equally the speed of passing traffic has led to regular road traffic accidents with cattle.</p>
	<p>Page 72 – PS06 The New Lawn, Nailsworth PS07 North of Nympsfield Road</p>	<p>The area PS07 represents an extension to the SDL up Tinkley Lane away from the Town in to the open countryside. The adjoining fields at Wood Farm, whilst not designated as SSSI (although adjoining Woodchester Park SSSI) represent a rare survival of species-rich hay meadows which should be protected and preserved in to the future. This development site would represent the start of what would be a creep up the valley that would detrimentally affect the overall character of the landscape, the Listed Woodchester Park, and also the local ecology. As such the National Trust object to this development proposal.</p>
	<p>Pages 87 and 88 – Stonehouse – PS19a Northwest of Stonehouse</p>	<p>We previously flagged up concerns in 2017 about this proposed site allocation (which was then referred to as site B2). This was particularly in relation to the potential landscape and visual impacts in relation to (NT owned) Haresfield Beacon and the Topograph viewpoint from which they are likely to be visible. We also noted that Haresfield Beacon and Standish Woods are experiencing a significant increase in visitor numbers, and additional house building in proximity to these places could exacerbate these issues.</p> <p>The current Local Plan already has a large site allocation in the Stonehouse area ('Great Oldbury'). We are very concerned that another allocation of considerable size (650 houses etc) would further extend the settlement in a northerly direction. The impression from the Cotswolds AONB, including Haresfield Beacon and Topograph Hill, may well be of large-scale urbanisation adversely affecting their views and setting. Whilst indicative strategic landscaping is shown, it is unclear as to how effective this would be in reducing landscape and visual impacts.</p> <p>Likewise, whilst detailed criteria to reduce car use is referred to, a large-scale development further from the original settlement core may struggle to demonstrate full compliance with policy DCP1.</p>
	<p>Page 89 – Stonehouse – PS20 M5 Junction 13:</p>	<p>This proposed land allocation would be located slightly further from (NT owned) Haresfield Beacon and Topograph Hill, yet it may still be visible in long distance views. We originally</p>

		<p>flagged this up in 2017, when PS20 was being referred to as sites D1 and D2.</p> <p>Ensuring that the massing and appearance of the buildings – particularly larger and industrial type buildings – reduces their wider impacts will be important. Landscaping in the form of strategic screening and tree planting dispersed within the site will also be beneficial.</p> <p>Again this site allocation – which is adjacent to the motorway – refers to detailed criteria to de-prioritise use of the private car, without such criteria being available.</p>
	<p>Page 153 – *NEW* Delivery Policy DHC2 Sustainable rural communities</p>	<p>Whilst we note that new housing under this policy can only proceed with parish council support, it would presumably apply to Tier 4b settlements such as Sheepscombe – a small village made up of dispersed housing in undulating terrain within the AONB. In this context, a scheme for 9 new houses could look rather out of place.</p> <p>Additionally, page 156 (and through the document), the NT welcomes the requirement to provide amenity space alongside development but the requirement around the quality and type of space provided should be strengthened throughout. If a development provides limited or unappealing spaces, any new development will again increase the already high pressure on the special (and obviously more appealing) natural sites in the district – such as Rodborough Common and Haresfield Beacon. There needs to be genuine efforts and more information around this area required through any planning applications therefore – and specific mention of ‘biodiversity net gain’, that doesn’t rely on existing sites - or development will run the risk of losing what is special about the district. As such, the National Trust feels it important to also identify new open spaces that are not tied to development and are either nature sites in themselves or green areas that ameliorate pressure on other special sites as identified in the draft Open Space and Community strategy.</p>
	<p>Page 173 - Delivery Policy DE11 District-wide mode-specific strategies</p>	<p>The National Trust supports the proposed preparation of a District-Wide Walking and Cycling Strategy.</p>
<p>4. Homes and Communities</p>	<p>Page 178 – Core Policy CP14 High quality</p>	<p>The National Trust supports many of the numbered aims and outcomes in this policy, including no. 9: “Contribute to a sense of place both in the buildings and spaces themselves</p>

	sustainable development	<p>and in the way in which they integrate with their surroundings including appropriate landscaping, biodiversity net gain, appropriate open space, sport and amenity space provision”.</p> <p>However, a lot is being fitted in here, and we would like to highlight the importance of providing green infrastructure, including nature-friendly features within new housing developments. This is something that is being promoted through the ‘Building with Nature’ standards, a collaboration between Gloucestershire Wildlife Trust and the University of the West of England, which can be applied to schemes of c. 10 houses and above.</p>
5. Economy and Infrastructure	Page 182 – Delivery Policy ES2 Renewable or low carbon energy generation [also see maps on pages 206 & 207]	<p>For many years the National Trust has supported a major increase in renewable energy generation, as long as proposals are of the right scale and right location. We would also want to see the natural and scenic beauty, and special qualities, of the Cotswold AONB conserved and enhanced; and for any effects on it setting to be taken into account. We would ask that the proposed approach to renewables is sense checked in this respect, and the AONB Conservation Board and Natural England are consulted and their feedback taken into account.</p> <p>The National Trust believes there should be mention, perhaps as a delivery policy in its own right, of ‘biodiversity net gain’. This matches a key requirement laid out in more recent government environmental documents and would fit well with the developing Gloucestershire Industrial Strategy. Key in that is that bigger developments can’t rely on existing sites for nature and must demonstrate a true net gain in what they do and their provision either directly on site or nearby. Development will run the risk of losing what is special about the district if this is not taken into account.</p> <p>As such, in this section the National Trust feels it important to also identify new open spaces that are not tied to development and are either nature sites in themselves or green areas that ameliorate pressure on other special sites.</p> <p>This is a good policy but could be strengthened by actively allocating land to deliver the nature recovery (or ecological) network. Potentially this will put a value on the land create a market whereby developers purchase strategically important sites for nature to guarantee they can deliver net gain for their developments.</p> <p>In ‘working with partners’, a key group not identified is the Local Nature Partnership. This</p>

		<p>group have been developing mapping tools to identify key nature corridors and where and how ecosystems can be protected alongside growth/ development. Working on a county-wide scale.</p> <p>Consultation by planning bodies with the Local Nature Partnership therefore alongside any major development proposals would make sense to protect biodiversity net gain and the intentions around this document in conjunction with carbon neutrality and green infrastructure.</p>
6. Our environment and surroundings	Pg 194, Delivery Policy DES2 Green Infrastructure	The National Trust supports the new policy, particularly increasing functionality of existing green infrastructure and supporting the development of new networks and corridors. It is vital that any new development is built with a net gain in biodiversity. Bringing new recreational access routes into areas of fragile habitats such as calcareous grassland and ancient semi-natural woodland needs avoiding or considerable environmental mitigation.