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Your ref: N/a



Stroud District Council

For attention of Planning Policy Team

**BY EMAIL ONLY**

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Dear Planning Policy Team

**Planning consultation: Stroud District Local Plan 'Emerging Strategy' consultation including Sustainability Appraisal and Habitats Regulations Assessment**

Thank you for your consultation on the above dated 16 November 2018 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Overview**

We welcome production of the 'Emerging Strategy' document and associated Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA). We offer comments on the SA and HRA separately below. With regard to the Emerging Strategy we note the quantity and type of development proposed and your conclusions regarding a 'hybrid' distribution of development across the district i.e. a combination of the concentrated development option but also including the growth points at Sharpness/Newtown and Wisloe.

In our previous response to the preceding 'issues and options' consultation Natural England set out a range of advice on the those environmental themes within our remit. That advice remains relevant but is not repeated here. The comments we set out below recognise that a revised policy framework has yet to be drawn up (notwithstanding the current local plan policies). Our comments focus on ensuring suitable evidence base information underpins the strategy's development. We look forward to working with the Council to address those environmental themes and issues where further dialogue is needed and in order to help formulate suitable policies.

**Emerging Strategy**

We note the four options described and the Emerging Strategy's preferred option whereby Option 1 (concentrated development) is amalgamated with Option 4 to create a 'hybrid' distribution of development across the district.

## Key issues

Question 1.0a - *Have we identified the top 5 issues for you?*

Yes.

Question 1.0b - *Do you agree with the ways we intend to tackle these issues?*

Yes, subject to our commentary separately with regard to the evidence base. We warmly welcome the measures summarised under Issues 2 and 4. We look forward to working with the Council on these themes.

## Local green spaces and community facilities...

Question 2.4a - *Do you agree with the ways in which the emerging Strategy intends to protect existing or deliver new local green spaces and community facilities?*

Yes. We welcome the stated measures and warmly welcome the Council's proactive approach and collaboration to better understand and manage recreation pressure on the Cotswold Beechwoods SAC, following its previous similar work in relation to the Severn Estuary and Rodborough Common.

Question 2.4b

*Do you support an alternative approach? Or have we missed anything?*

Measures to enhance the River Frome for migratory fish (Designated features of the Severn Estuary SAC) need to be factored into relevant initiatives.

## A vision for the future...

Question 3.1a - *Do you agree with the vision for 2040 as drafted?*

Yes

Question 3.1b - *Do you support an alternative approach? Or have we missed anything?*

The Defra 25 year Environment Plan encompasses the timescale up to and a little beyond 2040. We would welcome the opportunity for further consideration of this document's contents with you.

## Strategic Objectives...

Question 3.2a - *Do you agree with the Strategic Objectives as drafted?*

Generally yes. We would welcome the opportunity to consider with you how Objective 6 might be developed further e.g. with bullet points along the lines of Objective 5.

Question 3.2b - *Do you support an alternative approach? Or have we missed anything?*

## The emerging growth strategy...

Question 4.2a - *Do you support the broad approach of the emerging growth strategy, in terms of distributing the growth required by national policy for Stroud District?*

Yes, subject to further discussion and evidence base work. Our HRA response refers.

Question 4.2b - *Do you support an alternative strategy approach?*

No.

Question 4.2c - *Have we identified the right towns and villages for growth? Or do other settlements have growth potential?*

No comment.

Question 4.2d - *Do you support our approach to addressing Gloucester's housing needs?*

Yes and we welcome the Council's proactive role in commissioning the visitor survey for the Cotswold Beechwoods SAC in order to provide suitable evidence base material to inform such future development, similar to the existing Severn Estuary recreation management strategy. Depending upon the outcome of the Cotswolds Beechwoods SAC visitor survey consideration may need to be given to a situation where the 'zones of influence' for these European sites overlap.

Question 4.2e - *Do you support an alternative approach to addressing Gloucester's housing needs?*

No comment.

Making places: potential sites and alternatives...

Question 5.1a - *Assuming some growth is desirable, have we identified the best site(s) at each town and village?*

We wish to raise concerns regarding the following proposed allocations in terms of the Cotswolds AONB and its setting. We would welcome further dialogue regarding these sites and the impacts upon the AONB's special qualities:

<b>Settlement</b>	<b>Reference</b>	<b>Notes</b>
<i>Nailsworth</i>	<i>PS07</i>	<i>Within AONB?</i>
<i>Stonehouse</i>	<i>PS19a &amp; 19b</i>	<i>AONB setting and scale of development</i>
<i>Dursley</i>	<i>PS29</i>	<i>AONB setting</i>

Background studies

Question 6.1 *Are there any other specific local studies that you believe are needed to inform the Local Plan review?*

Please refer to our response to Q2 of the HRA report.

*Have you any advice on the scope or content of any of these studies?*

We would welcome further dialogue with the Council and Footprint ecology to progress work on the functionally linked land theme as well as the ongoing commission regarding recreation pressure (Severn estuary SPA/SAC/Ramsar Site, Rodborough Common SAC and Cotswold Beechwoods SAC).

## Habitats Regulations Assessment (HRA)

### **Q1 – Satisfactory overview?**

Natural England welcomes HRA at this stage of the plan and the stated approach in terms of working towards appropriate assessment when more detailed aspects of the plan have been drafted. We provide further detailed comments on the appropriate assessment stage below at Q4.

### **Q2 – additional evidence?**

We note the approach taken to screening in terms of distance thresholds and recognise the rationale for the chosen distances.

Cotswold Beechwoods SAC & recreation - In respect of this SAC we acknowledge the nominal status of the 5km threshold applied for screening purposes. Given the precautionary nature of assessment under the Habitats Regulations it is important to state this distance threshold will need to be reviewed according to the existing visitor survey evidence together with the results of the forthcoming visitor survey planned for later this year. We attach a copy of our advice letter dated 22.8.18 addressed to the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy authorities and subsequently shared with adjoining LPAs for information. We would welcome further dialogue regarding the use of the 5km threshold in the light of our advice to these neighbouring LPAs.

Severn Estuary SPA, SAC and Ramsar Site – We draw your attention to the publication of the latest in a series of high tide roost reports, this one being for the Gloucestershire section of the estuary: <http://publications.naturalengland.org.uk/publication/5655612985180160>

Further work is needed to collate and present information on land and waterways ‘functionally linked’ to the European designated site features. Examples of species making use of such functionally linked land and waterways cover the SPA bird species and migratory fish including European eel.

This strand of work also links closely to the water supply and water quality theme identified in the report.

An example of an existing strategy for dealing with functionally linked land theme (for waders and wildfowl) is the Solent Brent Goose strategy - <https://solentwbgs.wordpress.com/>

Air quality – We note and agree with the proposed approach to assessment. With regard to the DMRB methodology and the case law (Wealden v SSCLG 2017 ) Natural England draws your attention to our recently published document ‘*Natural England’s approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations*’ (NEA001) –

<http://publications.naturalengland.org.uk/publication/4720542048845824>

### **Q3 – Other specific stakeholders?**

Members of the Gloucestershire Local Nature Partnership.

**Q4 – Any key themes missing?**

The proposed themes appear comprehensive. On a point of detail regarding ‘urbanisation effects’ and the proposed 400m distance threshold we anticipate that in some situations growth such as new and expanded settlements may entail significant new transport, energy and water supply/drainage related infrastructure. The location, design and delivery of such infrastructure will need to take account of the most up to date available evidence on themes such as functionally linked land and waterways in order to avoid and mitigate severance, fragmentation and disturbance. Depending on the species and the nature of the land involved there may be a need to check that the 400m distance threshold is fit for purpose.

We acknowledge the report does not attempt to address ‘in combination effects’ at this stage in the process. However we would draw your attention to the ongoing road project at the A417 (Birdlip section) so that you may take this into consideration.

With regard to the district’s relationship with its neighbouring LPAs we welcome the report’s reference to the collaborative approach being taken to the forthcoming visitor survey of the Cotswold Beechwoods SAC. The Gloucestershire LPAs also collaborate through the Gloucestershire Local Nature Partnership. Relevant themes that may help to provide context for the HRA’s consideration of wider opportunities and synergies are included in the revised NPPF e.g. environmental and biodiversity ‘net gain’, a strategic approach to the planning of green infrastructure and the establishment of ecological networks.

**Q5 – Any local issues of relevance?**

No.

**Q6 – Any measures to include to help prevent impacts on N2k sites e.g. recreation?**

We remain committed to the dialogue with the local planning authorities on this theme. Ongoing work includes that to address the functionally linked land theme (Severn Estuary designations – please see above) and visitor survey work for the Cotswold Beechwoods and Rodborough Common SACs.

## Sustainability Appraisal (SA)

We welcome the thorough approach take to preparation of the SA. We have the following comments on the themes of biodiversity & geodiversity (SA objective 7) , landscape & townscape (SA objective 8) and 'Efficient land use (including soils and best most and versatile land) (SA objective 13):

Natural England notes the SA summary outcome of 'cumulative mixed (minor positive/significant negative) effect' for all three of these themes.

### 'Emerging growth strategy'

We note the following SA references to themes within our remit:

6.40 While the emerging growth strategy is to prioritise the use of brownfield sites across the district, the level of growth supported over the plan period will require development to proceed at a high number of greenfield sites. Development at the new settlement by Sharpness in particular would furthermore be in close proximity to the **Severn Estuary SSSI, SAC, SPA and Ramsar site**. A significant negative effect is expected in relation to SA objectives 7: biodiversity/geodiversity and 13: efficient land use.

'Table 6.4 Summary of SA effects for emerging growth strategy' allocates a '- -?' (Significant adverse) Score for SA7 Biodiversity. This is the only SA objective to attract such a score , highlighting the juxtaposition of the proposed new settlement immediately adjacent to the estuary with its multiple nature conservation designations and potential 'functionally linked land'. The scale of this development also requires consideration of loss of 'best and most versatile land'. Natural England will continue to advise the LPA in relation to this allocation.

Evidence base:

6.41 The emerging growth strategy would result in development mainly occurring away from the east of the district where the AONB is located. However, in addition to the development of a high amount of greenfield land, some growth would still occur around settlements such as Stroud which is noted to have high landscape sensitivity to new development.

We welcome the general trend towards avoiding those sites requiring development within the Cotswolds AONB, consistent with this designated landscape's level of protection. The SA report describes partial coverage of the district using Landscape Sensitivity Analysis (LSA) and makes a case for further evidence base work to address this shortfall. With regard to para 6.41 subsequent stages of the local plan's development should take account of any gaps in LSA where these represent a material gap in the evidence base.

Infrastructure

6.47.....The locations at which the most significant infrastructure improvements are likely to occur (new rail stations and improvements to junctions along the M5) are not in close proximity to any national or international biodiversity designations.(our emphasis)

Reserve sites

6.43 The supporting text states that there may be a need to identify reserve sites for housing, should the potential sites not come forward at the rates envisaged.

We draw the Council's attention to our comments within the HRA section of this response (please see answer to Q2 – additional evidence), specifically in relation to the need for further work to understand the distribution, extent and sensitivities of land and waterways functionally linked to the Severn Estuary designations.

For any queries relating to the specific advice in this letter only please contact me on 020 802 60939. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

