Stroud District Local Plan (2020-2040)
WATER RELATED PLANNING MATTERS STATEMENT OF COMMON GROUND ADDENDUM

between

Environment Agency &
Stroud District Council

February 2023

1. Introduction and background

1.1 This Statement of Common Ground (SoCG) covering water related planning matters has been prepared at the submission of the Stroud District Local Plan (the 'Local Plan') (2020-2040) and following the Regulation 19 Consultation for the Pre-Submission Draft Local Plan (Examination Library Reference Number CD1). The SoCG has been signed by Stroud District Council and Environment Agency), referred to hereafter as 'the parties'.

1.2 The purpose of the SoCG is to set out as at February 2023 further areas of agreement between the parties in respect of how water related issues have been progressed through the preparation of the Stroud District Local Plan.

2. Matters that are agreed

Context and actions taken to date

2.1 In respect of Evidence Base Level 2 SFRA the Council is pleased to confirm that JBA Consulting have updated references to the 2021 NPPF in the SFRA. The July 2021 climate change allowances have been added, as raised by the Environment Agency in their regulation 19 consultation response. The Environment Agency have been formally asked to undertake a final review under the EA Cost Recovery Review service in February 2023. It is anticipated that the SFRA2 will be formally signed off by the Environment Agency in Spring 2023.

2.2 The EA have recommended suggested changes to Delivery Policy ES4 wording in respect of water related matters including flood risk. The Council can agree proposed modifications following discussion with the Environment Agency and Severn Trent Water Authority set out in Appendix 1 of this SOCG.

2.3 The Council has consulted on an updated Infrastructure Delivery Plan (IDP) - Waste Water Infrastructure (EB 110). Both Severn Trent Water Authority and the Environment Agency were involved in updating this document with the Council's consultant ARUP. All parties acknowledge the principle that new development should not be allocated in areas that are not currently served by mains foul drainage, unless it is intended to provide new mains drainage in the area prior to development coming forwards.

3 *Commitments for future work and collaboration*

3.1 The parties agree that Stroud District Council, in preparing the Stroud District Local Plan (2020-2040), has engaged proactively and positively with the Environment Agency on water, air and land use related planning matters through the Duty to Cooperate.

4. Signatories

[redacted]
Signed on behalf of Environment Agency
[redacted]
……

[redacted]
Signed on behalf of Stroud District Council
[redacted]
……

Dated
21/02/23
……

Appendix One – Modifications to ES4 and Supporting Text

Delivery Policy ES4 - Water resources, quality and flood risk

The Strategic Flood Risk Assessments (SFRA 1 and 2) will be used to inform the location of future development within the District, including to take account of climate change.

In considering proposals for development the District Council will weigh up all of the relevant policy issues when giving full consideration to the sequential test and passing the "Exception Test" where necessary. Applications will be supported by Flood Risk Assessments (FRA) where appropriate that demonstrate the development will be safe, not increase flood risk elsewhere, assess and maximise opportunities to reduce flood risk (including Natural Flood Management), assess the impact of climate change and provide a Flood Emergency Plan where necessary. Flood risk shall be considered at an early stage in deciding the layout and design of a site to provide a reduction of flood risk as a result of the development.

All new developments shall incorporate ~~appropriate~~ Sustainable Drainage Measures (SuDs) in accordance with National Standards for Sustainable Drainage Systems. This should be informed by specific catchment and ground characteristics, and will require the early consideration of a wide range of issues relating to the management, long term adoption and maintenance of SuDs.

For all developments in areas with known ~~surface water~~ flooding issues, appropriate mitigation and construction methods will be required including, where appropriate, contributions towards maintenance of existing defences that benefit the site, development or maintenance of existing flood warning services, development of future flood alleviation projects and/or provision of upstream ~~rural SuDS~~ Natural Flood Management (NFM) projects.

Applications and proposals which relate specifically to reducing the risk of flooding (e.g. defence / alleviation work, retro-fitting of existing development, off site detention / retention basins for catchment wide interventions and green infrastructure) will be sought.

New development in areas with known ~~ground and surface water~~ flooding issues will seek to provide betterment in flood storage and to remove obstructions to flood flow routes where appropriate.

Development will:

1. Conserve and enhance the ecological flood storage value of the water environment, including watercourse corridors and catchments

2. Open up any culverted watercourse, where safe and practicable, to create an asset of ecological and community value

3. Achieve higher standards of ~~Improve~~ water efficiency design through water metering and incorporating ~~appropriate~~ water conservation techniques including rainwater harvesting and grey water recycling to achieve the standard of 110 litres per person per dwelling per day or less ~~Standard~~.

4. Discharge surface run-off, not collected for use, to one or more of the following, listed in order of priority:

a. discharge into the ground (infiltration); or, where not reasonably practicable

b. discharge into a surface water body; or, where not reasonably practicable

c. discharge to a surface water sewer, highway drain, or other drainage system; or, where not reasonably practicable

d. discharge to a combined sewer

5. Wastewater shall connect to the public ~~main~~ foul sewerage network where possible

6. Consider the cumulative impact of adjacent development(s) in devising an appropriate drainage strategy

7. Consider measures to help bring the waterbody to a good ecological status.

SUPPORTING TEXT

6.32 Water is a vital resource and its management is fundamental to sustainable development. The way in which water is managed can determine whether new development, land management, water usage, mineral working and waste management have a positive or negative impact on people and the environment. Good planning of water issues can provide us with clean and reliable water supplies, areas for recreation, habitats for wildlife and flood mitigation. Stroud District has an intricate network of rivers, streams and pools which contribute to the richness, diversity and beauty of our District. With a legacy of industrial infrastructure and historic water management issues, opportunities will be sought that can offer hydro morphological and ecological improvements e.g. removal and modification of barriers to habitat connectivity and fish movement such as weirs and culverts and achieving riparian improvements that contribute to natural and structurally diverse river corridors and floodplains. Within the natural environment, woods and trees can play a part in delivering positive water quality and water flow outcomes. They offer opportunities to make positive water use change whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure. Rivers can offer the multi-functionality with recreation, amenity and environmental purposes, allowing the preservation of flow routes and flood storage, and at the same time providing valuable social and environmental benefits contributing to other sustainability objectives. It is important functionality for this purpose should not compromise natural habitats One of the

many benefits of woods and trees is their ability to help us respond to a changing climate. Trees, in the right places, help us to adapt to climate change by reducing surface water flooding; reducing ambient temperature through direct shade and evapo-transpiration; and by reducing building heating and air conditioning demands. Therefore, the Local Plan seeks to adapt to climate change by minimising and militating against future flood risk and by managing its water resources.

6.33 Flood risk should be considered at an early stage in deciding the layout and design of a site to provide an opportunity to reduce flood risk within the development. When determining planning applications, the Council shall ensure flood risk is not increased elsewhere, and only consider development in flood areas where informed by a site-specific Flood Risk Assessment, following the Sequential Test and Exception Test if it should be demonstrated that:

- within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location using the flood risk vulnerability classifications;
- development is appropriately flood resistant and resilient (to include that in the event of a flood, it could be quickly brought back into use without significant refurbishment), including safe access and escape routes where required in accordance with DEFRA guidance;
- where necessary, it is accompanied by a Flood Evacuation Plan in consultation with the Emergency Services;
- any residual risk can be safely managed; and
- it gives priority to the use of sustainable drainage systems.

6.34 The Level 1 SFRA makes use of existing information to allow the application of the sequential test and to identify where the exception test is likely to be necessary. The Level 2 SFRA involves a more detailed review of flood hazard (flood probability, flood depth, flood velocity, rate of onset flooding) taking into account the presence of flood risk management measures such as flood defences.

6.35 Historically surface water drainage systems have been designed to remove surface water from a site as quickly as possible by means of underground piped systems. This has the potential to increase flooding problems downstream and does not contribute to the natural recharge of groundwater levels. Such systems contribute to the transport of pollutants from urban areas to watercourses and groundwater. With concerns surrounding the impacts of climate change and the requirements of legislation including the Water Framework Directive, a more sustainable approach to drainage is required to reduce flood risk, manage water quality and provide integrated amenity benefits.

6.36 The favoured approach in Stroud District is Natural Flood Management for dealing with surface water. Sustainable Drainage Systems (SuDS) aim to mimic natural drainage processes and remove pollutants from urban run-off at source. They comprise a wide range of techniques, including:

- Green Roofs
- Permeable Paving
- Rainwater Harvesting
- Swales
- Detention Basins
- Ponds
- Wetlands

6.37 This is not a comprehensive list and applicants should identify the most appropriate scheme, or combination of schemes to suit the proposed development. The multi-functional role of Natural Flood Management and SuDS should be considered in developments. They can provide, alongside flood alleviation measures, green corridors and wildlife habitat creation and therefore could provide holistic solutions for development sites as part of a wider green infrastructure network. Waterside areas, or areas along known flow routes, can act as Green Infrastructure, being used for recreation, amenity and environmental purposes, allowing the preservation of flow routes and flood storage, and at the same time providing valuable social and environmental benefits contributing to other sustainability objectives.

6.38 In the case of multiple development sites (sometimes part of a single allocation or multiple nearby allocations) a site drainage masterplan will be expected to ensure that multiple developers across different development sites work together towards an approved overall drainage strategy. Agreement of an overall master plan for the development will enable strategic infrastructure to potentially serve multiple development parcels and be designed appropriately to provide wider benefits and efficiencies in design that would not otherwise be possible. The drainage masterplan should also outline key milestones that need to be achieved for critical infrastructure prior to the commencement of some phases. This will help to align programmes between multiple stakeholders.

6.39 Consultation and discussion should take place with the Lead Local Flood Authority (LLFA) which is the County Council in relation to assessing Natural Flood Management projects. Such discussions should focus upon the run-off destination hierarchy set out in the National Standards for Sustainable Drainage Systems.

6.39a Defra announced in July 2021 that the Severn Trent Water geographical area is now considered to be in “serious water stress” for the purposes of water resource planning. The Secretary of State has accepted this advice. This means that the relevant water company has to consider compulsory customer water metering as part of its next Water Resource Management Plans. Previously in Gloucestershire there has not been the same water stress or demand for supply that would necessitate higher water efficiency standards than normal in proposed development. Water stress applies both to the natural environment and to public water supplies. Both will be affected by climate change. Public water supplies are under pressure from reductions in abstraction

to make them more environmentally sustainable. There is also a need to make public water supplies more resilient to droughts and meet additional demands associated with development and population growth. To help with this, water companies in areas which are under serious water stress are able to charge all customers for the volume of water used. This is measured by a water meter on each property. New development will be expected to achieve 110 litres per person per dwelling per day or less.