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| <p>Natural England</p> <p>Housing, Health and Crime</p> <p>Under these various socio-economic themes Natural England recommends the inclusion of more wide reaching information, most particularly around the use of spatial planning to resolve some of those issues raised in the baseline data. For instance, there is no mention in the Crime section of the Designing Out Crime Association, which has been looking at specifically these points from an environmental design perspective since 1999, and has produced several useful works. Under housing there is no mention of sustainable construction, nor the wider opportunities of place making and designing buildings and places for people and biodiversity.</p> <p>Sources/evidence/baseline data for this theme should include several appropriate publications by CABE, e.g. Inclusion By Design.</p> <p>For the indicator needed to monitor the promoting good design, Natural England would direct you towards the CABE standard "Building for Life", which is designed for planners, and includes an assessment process. http://www.buildingforlife.org/</p> | <p>No action. The purpose of the Scoping Report is to outline the current baseline and identify significant sustainability issues for the District. It is not possible to include all relevant information for each topic. Issues such as sustainable construction and designing out crime will be relevant at the detailed design stage of planning and are less relevant at the strategic level. Such information will be useful during the development of more detailed LDF documents as opposed to strategic documents.</p> |
| <p>Health Baseline Data</p> <p>Planning influences key determinants of public health, so it is important that close consideration should be given to those elements of public health that planning can influence, and dataset sought on that basis. While Natural England is broadly happy with the indicators listed, we feel that there are datasets relating to health and wellbeing which have been excluded to the detriment of accurate monitoring of possible health benefits. Natural England recommends that Scott Wilson contact the National Obesity Observatory www.noo.org.uk/ and the South West Public Health Observatory www.swpho.nhs.uk for possible indicators.</p> | <p>No action. Although issues such as obesity are an important health factor and are relevant to the wider remit of spatial planning it is difficult to directly associate the effects of implementing policy with levels of obesity. It is therefore considered that utilising obesity as an indicator will not provide a suitable measure of the effects of the implementation of the plan.</p> |
| <p>Transport</p> <p>Natural England would wish to see an overview of rights of way provision within the context review. Footpaths and Bridleways provide a network of non-vehicular routes essential for the promotion of multi-modal travel. As Transport choices are one of the key sustainability issues this would seem essential. They also provide the one part of the baseline for Green Infrastructure. This information should be available in the <i>Gloucestershire Rights of Way and countryside access Improvement Plan 2006-2011</i> from Gloucestershire County Council.</p> | <p>Agreed. An overview of Rights of Way provision will be added to the baseline data.</p> |
| <p>Biodiversity</p> | <p>No action. The habitats and species listed are taken from</p> |

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| <p>15.3.1 UK BAP priority habitats and Gloucestershire BAP Habitats need not be specifically listed at this point. The UK Habitats as listed are incomplete as per the latest data (August 2007), and as you know (point noted in 15.4.10), the Gloucestershire BAP is currently under review, and should be available by the end of 2009. Natural England cannot approve a Sustainability Appraisal that does not incorporate the latest information and trend data. It is the primary mechanism for the delivery and monitoring of biodiversity conservation at the local level, and as such is essential to the SA process. We therefore recommend that the full existing data is published as an appendix, with a provision to incorporate the revised local BAP when available.</p> | <p>the Gloucestershire BAP, as referenced in Appendix 4, as opposed to the UK BAP. Since the Gloucestershire BAP is being reviewed during 2009/10 the habitats and species are likely to be updated. The Council will monitor and review these aspects in the future.</p> |
| <p>15.4.8 Natural England recommends the inclusion County Wildlife Sites in the baseline. There is a significantly greater area of CWS than any other designation, and though they may not be statutory sites, they are in positive management and provide an invaluable contribution to the Natural Environment. They should therefore be included not just for the purpose of prevention of harm, but to provide opportunities for enhancements and landscape scale biodiversity gains.</p> | <p>Agreed. Information relating to County Wildlife Sites will be added to the baseline data.</p> |
| <p>As requested in the previous consultation, Natural England would prefer to see the legislative definitions of European Sites and SSSI's included in the text.</p> | <p>No action. It is inappropriate to include legislative definitions of designated sites. The SA Scoping Report is not supposed to be a comprehensive document containing all relevant information about all issues – it is a collation of relevant information and data. However, the text will be reviewed to ensure that the language used is as accessible as possible.</p> |
| <p>15.4.11 As well as continuing the call to give more prominence to the principle of habitat restoration, as is recommended in PPS9 and the Regional RSS, Natural England would also point out that there is a detailed plan for restorations in the South West Nature Map.</p> | <p>Noted. The text will be updated as appropriate.</p> |
| <p>15.5.1 It was recommended in the previous consultation that “The reasons for unfavourable condition on SSSIs/European sites in Stroud District are varied, however a lack of appropriate management would probably be the most common problem.” Yet at 15.5.1 this point is still excluded, and furthermore, there is an assumption of continued decline. Without appropriate management this may well be so, but management is an easy factor to rectify (compared to climate change), and as such it is important that this point be made, with a recommendation to improve current performance, where Stroud has the opportunity to do so.</p> | <p>Noted. The text will be updated as appropriate. However, given past trends it is appropriate to assume that the condition will continue to decline but your comment relating to appropriate management will be incorporated.</p> |
| <p>(15.7.1), Natural England recommends replacement of the existing Objective “<i>conserve and provide enhancement of the natural environment and biodiversity</i>” with the phrase “Create,</p> | <p>Noted. Revised wording will be incorporated into the objective to reflect latest advice: “Create, Protect,</p> |

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| <p>Protect, enhance, restore and connect habitats, species and sites of Biodiversity or geological interest through appropriate planning."</p> <p>The connectivity of habitats is vital to their survival and so "connect" should be included in both the objective and theme also. Connectivity is the main analytical process driving the Gloucestershire Nature Map launched in March 2008. It highlights Strategic Nature Areas (SNAs) which are priority areas for habitat protection, restoration and connectivity. SNAs are adopted in the Regional Spatial Strategy.</p> <p>Connectivity, along with multi-purpose use, is central to the concept of Green Infrastructure, which Natural England considers essential for a truly sustainable development. Natural England therefore recommends inclusion of a separate Green Infrastructure objective and theme. Reasons for this are outlined below.</p> | <p>Enhance, Restore and Connect habitats, species and/or sites of Biodiversity or Geological interest." The term "through appropriate planning" could be contentious. Planning and many other organisations work in partnership to deliver projects on the ground and it is not planning alone. Planning is a balanced decision taking account of many factors such as economic or social ones. The Council would not wish to fetter its judgement of these other factors by the loose term "appropriate planning". Appropriate to whom?</p> <p>The topic-based chapters in the SA Scoping Report reflect the requirements of the SEA Directive. The issue of green infrastructure is a cross-cutting issue that can be considered within the topics of transport, biodiversity, landscape, health, etc. It is not possible to incorporate all issues at all levels and therefore a pragmatic approach has been taken to identify the most appropriate topics to include to ensure that relevant sustainability issues are identified. The issue of green infrastructure is, as you rightly point out, a policy requirement and therefore the effects of implementing a GI network will be assessed through the SA process.</p> |
| <p>Severn Estuary SPA/Ramsar/SSSI/pSAC</p> <p>Natural England are concerned that any proposed developments could have potential negative impacts on the habitats and species within the Severn Estuary SPA/Ramsar/SSSI/pSAC due to possible in-combination effect of increased abstraction from the river Severn. Although there is a big problem with quantifying the issue because of the multiple authorities responsible, any policy in the Stroud District that might impact upon a Natura 2000 site is subject to European Habitat Regulations Assessment. Natural England therefore recommends that this be included as a Sustainability Objective, either under Biodiversity or Water, and that in it, Stroud gives consideration to the resolution of the cross-boundary effects.</p> | <p>No action. A Habitats Regulation Assessment will be undertaken at the appropriate time in the development of the Local Development Framework.</p> |

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| <p>Landscape character</p> <p>As was requested previously, but not subsequently included, we continue to recommend the use of information generated as part of the Countryside Quality Counts project run by Natural England, English Heritage and Defra. Countryside Quality Counts (CQC) is a project to develop a national indicator of how the countryside is changing. It aims to understand how and where change is occurring, and most importantly, where change matters the most. This information can be used to help plan future landscapes and inform change that delivers public benefits - enhancing and maintaining the character and quality of our countryside for this and future generations.</p> <p>This data has recently been revised and updated. For further information go to; http://countryside-quality-counts.org.uk/pubs_2ndAssess.html</p> | <p>Noted. The information will be reviewed and referenced where appropriate.</p> |
| <p>Green Infrastructure</p> <p>Natural England has defined Green Infrastructure (GI) as the network of protected sites, green spaces and linkages which provide for multi-functional uses relating to ecological services, quality of life and economic value. GI should be delivered at all spatial scales from sub regional to local neighbourhood levels.</p> <p>Our primary concern is that any future urban development should include the provision of connected accessible green spaces, and that natural and semi-natural habitats and multi-functional open spaces are considered an integral part of the overall strategy and design. It presents a real opportunity to develop an integrated approach for areas earmarked for extensive new development to achieve gains across a range of objectives for biodiversity, landscape, recreation, health, housing, education and economic growth. The provision of GI also links closely with existing rights of way.</p> <p>Development of a "Network of GI" is specifically required in the Regional Spatial Strategy (G11), and the creation of a GI plan is advised. Natural England is working with the County on the Strategic Infrastructure Delivery Plan, and would hope to be of assistance to Stroud on the creation of a GI plan or strategy for their authority.</p> <p>Natural England notes that the authority is aware some of the risks from the requirement to build on previously developed land, to cultural heritage and the townscape as well as social infrastructure. Green Infrastructure is just as important for existing communities, if not more so. We would therefore recommend that Green Infrastructure be a material consideration of all "infill"</p> | <p>No action. The topic-based chapters in the SA Scoping Report reflect the requirements of the SEA Directive. The issue of green infrastructure is a cross-cutting issue that can be considered within the topics of transport, biodiversity, landscape, health, etc. It is not possible to incorporate all issues at all levels and therefore a pragmatic approach has been taken to identify the most appropriate topics to include to ensure that relevant sustainability issues are identified. The issue of green infrastructure is, as you rightly point out, a policy requirement and therefore the effects of implementing a GI network will be assessed through the SA process.</p> <p>The issue relating to infill development is an issue for the determination of planning applications and therefore is inappropriate for consideration at the Scoping stage of SA.</p> |

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| sites. | |
| English Heritage | |
| <p>In general terms, it is important that the historic environment is given equal weight as is given to other environmental considerations, particularly the natural environment. English Heritage has produced guidance on SEA/SA and the historic environment that gives general guidance on what should be included within the scoping report in order to comply with the remit of English Heritage. The guidance includes suggested wording for policies and indicators for the Historic Environment.</p> | <p>Noted. The guidance will be reviewed.</p> |
| <p>Chapter 10 – Cultural Heritage</p> <p>We welcome this issue as a separate item within the Scoping Report. It picks up on a number of evidence devices that are key to making Stroud a distinctive area. With the introduction of the Heritage at Risk initiative in June 2009 the English Heritage Register will be extended to include Scheduled Monuments, Historic Parks and Gardens, Battlefields and Conservation Areas. It may therefore be relevant to this study to revisit this area once the register has been published.</p> | <p>Noted.</p> |
| <p>Baseline data collection and Indicators</p> <p>In order to establish the current status of the historic environment and assess any potential impacts this issue must be addressed. General advice on the scope of baseline data relevant to the historic environment is given in the guidelines set out in the guidance. Key aspects include:</p> <ul style="list-style-type: none"> • All designated historic assets (this should include Historic Parks and Gardens, Battlefields and Marine Archaeology [where applicable]) • Non designated features of local historic interest • The character of the wider landscape and townscape • The potential for as yet unrecorded archaeological interest <p>The main data sets can be accessed via the Historic Environment Records held by the County Council. Information can also be acquired from the English Heritage Data Management Unit at Swindon.</p> | <p>No action. The baseline includes many of these aspects of the historic environment.</p> |
| <p>It is noted that the Landscape section does include a section on landscape character assessment that is welcomed by English Heritage. Evidence of how this assessment can be integrated into the cultural heritage section should be considered as it will help to provide consistency of evidence between different issues. It is also reassuring to see that the report recognises the significance of the Stroud Industrial Heritage Conservation Area Appraisal and</p> | <p>Noted. Consideration will be given to including cross-reference to landscape character in the Cultural Heritage section.</p> |

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| <p>the canals. These are unique assets in the area that require an appropriate level of special treatment within the SA/SEA.</p> | |
| <p>Is it acknowledged that the sections on Environmental and Sustainability Problems and Proposed SA/SEA Objectives are designed to be concise throughout the report but it would be useful to understand whether the following issues have been considered in shaping the objectives in particular as there should be the link between sustainable communities, design and conservation. Some issues have been picked up but the list below may help to identify others that are missing:</p> <ul style="list-style-type: none"> • Reusing the historic environment, particularly buildings, lies at the heart of sustainable communities. • The historic environment adds value to regeneration projects • The historic environment is a proven source of employment and helps underpin the local economy. • An attractive environment can assist in attracting external investment as well as maintaining existing businesses of all types, not just tourism-related. • People are immensely proud of their local history. Surviving heritage, even if hidden below ground, is synonymous with local identity. People don't always express how much they value a place until it is threatened. Heritage is a fundamental element that contributes towards local character and distinctiveness. • The historic environment is a powerful focus for community action • Outcomes such as increased community cohesion and greater social inclusion can be achieved through renewed focus on the historic environment. Involving communities at grass roots level in their local heritage can be a vital medium in bringing communities together through a shared understanding of their diverse histories. • The historic environment is a local education resource for people of all ages. For example, archaeological remains can be used to explain the history of a place and the communities that have lived there, so helping to make people feel at home. • Local environments that are understood and valued tend to be better looked after than those that are not linked to communities and can help to foster civic responsibility and citizenship. This in turn can have positive implications for anti-social behaviour problems and community well-being. This historic environment contributes to everybody's quality of | <p>Noted. It is not possible to consider all potential issues when identifying appropriate issues and objectives. The purpose of the SA Scoping Report is to identify significant issues from the baseline data available.</p> |

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| <p>life.</p> <p>Whilst it is recognised that you are seeking information and data sets relating specifically to Stroud, use should be made of the latest version of English Heritages annual monitoring report 'Heritage Counts: State of the Historic Environment 2008'. This incorporates an update summary of the number of listed buildings, Scheduled Monuments, conservation areas and historic parks and gardens for each of the County Councils and Local Authority areas. This revised data should be used to inform the baseline. You should also check with the District's conservation officer to ensure that this data conforms to their understanding of it. Some differences in the way the data is put together may suggest discrepancies.</p> | <p>Noted. Revised data has been reviewed and the baseline updated where appropriate. Stroud DC's Conservation Officer has been consulted throughout the process.</p> |
| <p>Environment Agency</p> | |
| <p>As a general point, we do have some general advice in relation to Strategic Environmental Assessments (SEA) on our website at: http://www.environmentagency.gov.uk/research/policy/32977.aspx This includes advice on our role as a source of information and includes baseline environmental information.</p> | <p>Noted.</p> |
| <p><u>CLIMATE</u></p> <p>Introduction We welcome the fact that you have taken on board the suggestions made in our previous letter and in (Para11.1.1) have added the wording <i>human activity</i> as a further major contributing factor to climate change, and in (Para 11.1.4) included <i>significant impacts upon the economy</i> to further strengthen the initial point.</p> | <p>Noted with thanks.</p> |
| <p>Environmental Protection Objectives We note that (Para 11.2.2) has been added to the report to reflect the introduction of the Climate Change Act 2008. This updates previous statistics in relation to greenhouse gas and CO₂ emission reductions.</p> | <p>Noted.</p> |
| <p>Context Review We welcome the addition of row 1 of the table on energy efficient options for new and existing buildings and agree with the importance of economic benefit, as this is likely to have an influence on people's behaviour environmentally.</p> <p>As indicated in our previous letter Planning for Climate Change, a supplement to Planning Policy Statement 1 should clearly support this section and indeed the whole SA Report. We are</p> | <p>PPS1 supplement on Climate Change is referenced in the Context Review.</p> <p>The data contained within the Context Review is taken from the document referenced and is not available in another format.</p> |

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| <p>therefore pleased to see that row 3 of this section has been updated further to its adoption to reflect the key planning objectives of the policy.</p> <p>We are pleased to see you have added the wording “<i>Policies should avoid placing new development in unsuitable flood risk locations</i>” to row 5 of the table to further reflect the principles of Planning Policy Statement 25: Development and Flood Risk (PPS25) and welcome the inclusion within table 11.3.1 on the potential impacts of climate change in relation to flood risk within the district and continued commitment to follow the guidelines set out within PPS25.</p> <p>We did suggest that in the Evidence Base column of line 6 reference should be made to PPS1 supplement on Climate Change. This does not appear to have been done.</p> <p>We suggested previously that it may be better for rows 7&9 of the old table to be represented as percentages, we notice this has not been reflected in rows 11&13 of the new table. Is this because it is not known what the percentage of total energy provision the sub-regional renewable target represents? (e.g. is 20% of all energy provision in Gloucestershire meant to be renewable? or 50% or 70%?. Using percentages would make it more meaningful as 40-50MW by 2010 is difficult to relate to.</p> <p>We are pleased to see that rows 6, 14 & 15 have all been added to the table, however we feel that row 6 in relation to the schemes to measure the sustainability performance of new homes should also make reference to BREEAM in the Evidence Source column, because environmental standards need to also improve in non residential buildings. Therefore the key messages column should include non residential uses as well.</p> | <p>The Code for Sustainable Homes is a mandatory standard against which all new residential development must be assessed. BREEAM is a voluntary standard and therefore it is inappropriate to include it within the Context Review as new non-residential development is not required to meet BREEAM standards.</p> |
| <p>Baseline</p> <p>We notice that a new paragraph has been added to the beginning of this section and welcome its inclusion. However can you confirm what the small wavy line preceding the numbers in bullet points 2 & 3. I presume it is not a minus, and perhaps it should be removed as it is somewhat confusing.</p> <p>In Para 11.4.2 we note you make reference to the UKCIP09 Report which is to be produced in Spring 2009. We would suggest that as this will update the current UKCIP02 predictions that on completion it is included in updates to the SEA.</p> | <p>No action. The character that is referred to is a swung dash character (-). It is commonly used for "approximates" or "is approximately equal to".</p> <p>The UKCIP09 Report will be included within updates to the SA.</p> |

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| <p>In general we welcome the changes to the way the climate change baseline information has been presented as it makes more specific to the Stroud area and highlights the sectors where the emissions are occurring.</p> | |
| <p>Likely Future Conditions In our previous response we suggested that we would like to see estimates of the possible impacts of the consequences of global warming in relation to biodiversity, flood risk, health etc. We notice this has not been included in Para 11.5.4 of the new report. We therefore question whether it has been attempted to make anymore locally specific climate predictions or likely future conditions and would still recommend this is attempted.</p> <p>We are cautious about the appropriateness of including Para 11.5.3 on the Severn Estuary Scheme, as this is by no means certain to take place. If it is intended to include this it should be caveated and also the possible negative environmental impacts such as biodiversity need to be highlighted (We note the wording in the Biodiversity Section 15.5.2 and 15.6.1 are more cautious)</p> | <p>No action. It is not possible to estimate the possible impacts of the consequences of climate change in relation to various issues and it is not the remit of the Scoping Report to do so. The Scoping Report is very much reliant on data available from external agencies, such as the Environment Agency, to provide such relevant information.</p> <p>Noted. The text will be updated as appropriate.</p> |
| <p>Proposed SA/SEA Objectives We are pleased to see that you have reworded the first objective to strengthen the issue of energy efficiency through building design and further highlight the use of renewable sources of energy, as suggested in our previous letter. We are however disappointed that our suggestion of including a third objective to reduce the use of the private car has not been incorporated in either this section or the transport and accessibility Section 7. We would therefore reiterate the comments made in our previous letter and recommend the following third objective being added:</p> <ul style="list-style-type: none"> • <u>To reduce the use of the private car by implementing strategies to locate development in the most sustainable locations and improve public transport through developer contributions.</u> <p>you may not agree with the suggested wording of the condition, however we still consider an objective on reducing the use of the private car is needed.</p> | <p>No action. The objective “To promote traffic reduction and encourage more sustainable alternative forms of transport” reflects the rural nature of the area and the current reliance on the private car to access facilities and amenities.</p> |
| <p>AIR</p> <p>Environmental Protection Objectives We note that the Directives in this section have been updated.</p> | <p>Noted.</p> |
| <p>Baseline</p> | <p>The AQMA was revoked after air quality returned to within</p> |

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| <p>We notice in Para 12.4.2 that following further assessment, work identified that an AQMA was required and one was established in 2001. We would therefore be interested to know why the AQMA was then revoked in 2004 following a review of air quality. This is important for judging how significant an issue air quality is and whether there is a risk that an increase in traffic could mean the AQMA is re-established.</p> | <p>acceptable levels. The text will be amended to clarify this.</p> |
| <p>Likely Future Conditions & Environmental and Sustainability Problems We previously stated that sections 11.5 and 11.6 should acknowledge that any general increase in car use (for M5 Motorway) and specifically in Stroud District (for town centres) will exacerbate air quality pollution. We notice that this statement has not been incorporated into the corresponding Paras 12.5.1 or 12.6 of the revised report. We consider this is still relevant given the recent AQMA status and the above comments.</p> | <p>No action. Section 12.5 acknowledges that “it is likely that there will be a continuation of the current situation where air pollution is much worse in urban areas and around the M5 motorway corridor than in rural areas.”</p> |
| <p><u>SOIL</u></p> <p>Context Review Table We are pleased to see that you have made reference to Planning Policy Statement 3: Housing, as an evidence source in the third row of the table as highlighted in our previous letter, and welcome the inclusion of PPS1 as an Evidence Source in row 2 of the table. However the attached key message seems to relate to the economic and social aspects of PPS1 and not the environmental, (specifically the prudent use of natural resources – PPS1 –Para 4). We therefore feel this key message needs to be altered to be more relevant to soil.</p> <p>We are pleased to see that you have made reference to “the precautionary approach” as advocated by Planning Policy Statement 23: Planning and Pollution Control (PPS23) in line with our previous recommendation.</p> <p>Row 11 of the table still does not take into account our previous comments, where we suggested including that water supply/shortage will also be affected by climate change, and this may have an impact on how we use soil for growing purposes. Therefore we feel this still needs to be mentioned in this section (Although it could be relevant to the sections on climate change or water)</p> | <p>The reference to PPS1 in the Context Review will be amended to be more relevant to soil.</p> <p>The issue of water supply is relevant to the water chapter as opposed to soil. The corresponding section in the water chapter will be updated accordingly.</p> |
| <p>Baseline We are pleased to see that table 12.2 of the report has been updated to reflect more recent figures as we suggested in our previous response. We are however surprised to see that the 2007/08 figure is 100% and would be interested to know how the data has been derived at.</p> | <p>No action. The data is referenced and the corresponding document should be consulted for further information.</p> <p>The information relating to non-residential development is</p> |

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| <p>As outlined previously it would still be useful to have figures for non residential developments as well as homes.</p> <p>Previously we suggested that more up to date information would better inform Para 12.5.2 now 13.5.2, we note however that this para has not been changed, our concern is that there will not be an endless supply of Brownfield land and therefore the statement on agricultural land resource may not be accurate.</p> | <p>not available.</p> <p>Para 13.5.2 and the reference to previously developed land will be amended to offer greater clarity regarding the likely situation.</p> |
| <p><u>WATER</u></p> <p>Introduction</p> <p>We are disappointed to see that Section 14.1.5 still does not make reference to Sustainable Drainage Systems (SuDS) as previously suggested. We would therefore reiterate the need for its inclusion and suggest rewording this paragraph as follows:</p> <p>“Therefore a key aim of land use planning is <u>to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, using SuDS in development to avoid increasing flood risk and to direct development away from areas at highest risk</u>”</p> | <p>Noted. Amend Section 14.1.5 to include reference to SuDS and better reflect PPS25.</p> |
| <p>Environmental Protection Objectives</p> <p>As a key piece of legislation on water we are disappointed that despite our previous recommendations for the inclusion of PPS25, it does not appear that any reference has been made to it in this Section of the report. We would be expecting reference to be made to the requirement to reduce and manage flood risk and use SuDS in development.</p> <p>Section 14.2.4 refers to the Pollution Prevention and Control Regulations 2000: These regulations have now been superseded by the Environmental Permitting Regulations 2008. Therefore this section needs to be amended to reflect those changes.</p> <p>We are pleased however that you have included the wording “<i>improve water quality and promote</i>” into the opening line of Para 14.2.5 and whole heartedly support the inclusion of the Water Framework Directive, as we see this as a key piece of legislation.</p> <p>Section 14.2 Environmental Protection Objectives needs to include European Directives on</p> | <p>No action. PPS25 does not qualify as an Environmental Protection Objective as it is not a piece of legislation but statement of policy intent.</p> <p>Section 14.2.4 will be updated to reflect the changes to legislation.</p> <p>The European Directives on Freshwater Fish and Dangerous Substances will be added where appropriate.</p> |

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| <p>Freshwater Fish and Dangerous Substances. Environmental Quality Standards (EQS) are set out in these and the Environment Agency reports on compliance. These Directives will be replaced by the Water Framework Directive in 2013.</p> <p>The EC Directive on Freshwater Fish is designed to protect and improve the quality of rivers and lakes to encourage healthy fish populations. It sets water quality standards and monitoring requirements for areas of water which are chosen, or 'designated' by Defra. These 'designated' areas of water are selected because they are significant bodies of water which are capable of supporting fish populations. The following rivers have been designated in the Stroud area and these must be protected to ensure we meet the requirements of this Directive.</p> <p>River Cam is designated salmonid from ST796993 to SO756022 and cyprinid from SO756022 to SO738050 River Frome SO951067 to SO812042 is salmonid, SO812042 to SO751105 is cyprinid (south arm), SO823044 to SO781057 salmonid (north arm) Nailsworth Stream ST897984 to SO834045 salmonid Gloucester/Sharpness Canal SO75600935 to SO 756094 cyprinid There are no current failures of this Directive within the Stroud DC area.</p> <p>The Dangerous Substances Directive Controls the levels of dangerous substances going into rivers by discharges. Dangerous substances can potentially harm our health, aquatic life and water quality. They include certain industrial chemicals, pesticides and metals. They are not only found in sewage and trade discharges, but water passing through contaminated land and old mines can wash dangerous substances out into the environment. Rainwater runoff from roads and some industrial sites can also release dangerous substances into watercourses.</p> <p>There are no current failures of this Directive within the Stroud DC area however there have been recent copper failures in the River Severn at Purton, downstream of Blakeney and downstream of Lydney.</p> <p>The Water Framework Directive Draft River Basin Management Plan for the River Seven is now complete and available on our website www.environment-agency.gov.uk/research/planning/33106.aspx. This report will help to inform a water quality data baseline.</p> | |

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| <p>Context Review</p> <p>We are pleased to see that you have improved line 5 of the table in accordance with our previous comments to strengthen the principles of PPS25. However there are 2 typographical errors in the text, it should actually read:</p> <p>“Policies should avoid placing new development in unsuitable flood risk locations so that <u>neither</u> the development, third parties or the floodplain itself are unacceptably <u>impacted</u>.”</p> <p>We are pleased to see row 6 of the table has been added further to the Pitt Review, however as part of the evidence base for this document, there are specific recommendations within the Pitt Review which will impact on Local Authorities, this includes Identifying flood risk from all sources, including surface water run-off, ground water flooding and ordinary watercourses, and that this is managed. The Pitt Review also recommends that Local Authorities should have a local leadership role for Flood Risk Management. We would therefore recommend this being incorporated as a key message.</p> <p>We consider that an extra column should be added to the context table, to include the SFRA as an Evidence Source and the Key Messages from the Context Review would draw on the recommended Development Control Policies contained within the SFRA. The SFRA included a broad evidence base which included documents such as the Shoreline Management Plan (SMP) and Catchment Flood Management Plan (CFMP). Whilst the SFRA has covered and considered these plans any updates to them (specifically the SMP which is currently being updated) might not be adequately represented in the baseline/context review. Therefore you may wish to include the SMP and CFMP as well. We can provide copies of these if necessary.</p> <p>In row 9 of the table we notice that the text has changed from that in the previous report, however the data source is the same. We would therefore like to see justification as to why it appears that now “Re-opening of disused canals will not intensify water resource demands”, whereas previously it appeared that the re-opening of the canals may intensify water resource demands. Also we are unsure whether the mentioning of the abstraction licence at Brimscombe is relevant for a strategic document, seeing as this is a site specific matter which has as yet only been agreed in principle and will be subject to caveats once finalised.</p> | <p>The typographic errors will be amended.</p> <p>The recommendations of the Pitt Review will be incorporated where appropriate.</p> <p>The SFRA is part of the baseline and its key messages will be added where appropriate.</p> <p>The text relating to canals from the Gloucestershire BAP will be amended to ensure that it correctly reflects the document.</p> |
| <p>Baseline Groundwaters</p> | <p>Noted. The text will be amended where appropriate.</p> |

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| <p>It may be worth adding the word map to the end of "Stroud District Groundwater in Section 14.4.8 so it is clear what Appendix 5 relates to.</p> | |
| <p>Flood Risk We welcome the inclusion of the section on the SFRA and the inclusion of the section on the SFRA and the Flood Risk Map. We assume that the map incorporates the climate change mapping in the SFRA, as this is the appropriate mapping to use for long term strategic planning.</p> <p>Although Section 14.4.9 states that a Strategic Flood Risk Assessment has been produced for the District, this is misleading as currently only a Level 1 SFRA has been produced a Level 2 SFRA will be required which is a more detail review of flood risk looking at flood hazard, depths of water and flood velocities. As well as recommending polices to ensure that flood risk is not increased.</p> <p>Also in the second bullet point under paragraph 14.4.9 it states "The risk of the Severn coming out of its bank during periods of high flows has been substantially mitigated by defences along the estuary" which is a quote from SFRA, however it should be noted that there are substantial areas of high risk floodplain shown behind these defences where flooding could occur as a result of overtopping or a breach of flood defences. The impacts of climate change and sea level rises could increase the risk of this occurring.</p> <p>In addition whilst we understand that this paragraph is a quotation for the SFRA, we would recommend changing the paragraph as per the italics below to take account of the fact the SMP may change in the future:</p> <p><i>As a result of Climate Change the depth of flooding is likely to increase in the floodplains in the south and east areas of the District. The Severn Estuary and its downstream tributaries will be subject to increased storm surges and wave height for which the Environment Agency currently maintains the level and standard of the defences in the Estuary guided by the current Shoreline Management Plan (SMP). Subsequent SMP documents (the second version is currently in review) will provide the future strategic view on the options for the management of flood risk in the Estuary. Development proposals in this area should be mindful of the current and future level of flood risk.</i></p> <p>Up to date policies and plans should form the basis of the continued inclusion of appropriate</p> | <p>Noted. The text relating to the SFRA will be amended to ensure that it is clear that a Level 1 SFRA has been undertaken.</p> <p>The text relating to the SFRA will be amended as per your suggestion.</p> |

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| <p>robust policies within the local plan/LDF in relation to flood risk from all sources in line with PPS25 and the government's 'Making Space for Water', along with the other regional and local documents listed within this chapter and the context review.</p> | |
| <p>Likely Future Conditions Whilst we are pleased to see that Sections 14.5.3 – 14.5.5 have all been added to the revised report, we feel that section 14.5.3 still needs to be expanded upon.</p> | <p>Noted. Advice from the Environment Agency will be sought with regard to appropriate additional text.</p> |
| <p>Proposed SA/EA Objectives We are pleased to see that you have included the word <i>manage</i> to the second objective in Para 14.7.1 as we previously suggested.</p> <p>In particular we welcome this objective as it will help to deliver a long term goal for managing and where possible reducing flood risk within the district as a whole through diligent planning of new development or in the change of use of existing development.</p> | <p>Noted.</p> |
| <p>Additional comments</p> <p><u>Water resources, sustainability and conservation</u> The water section focuses mainly on water quality and flood risk. Unfortunately there is very little about sustainable use of water, or water conservation. This is a weakness of this section that should be rectified.</p> <p>Would have liked to see a section on both sustainable use of water, highlighting present usage at 145 litres per day, and illustrating how this could be reduced, such as by:</p> <ul style="list-style-type: none"> a) Changing people's habits e.g. dripping taps repaired, bowls in sinks etc. b) Conservation of water e.g. only use drinking water quality when needed, using grey water to flush loo's and rainwater for watering gardens (water-butts) c) Industry to undertake water audits and use those to reduce demand for water (both drinking and potable). <p>The above should be linked to Climate Change and reduced availability of water. Only paragraph 14.5.5 (two lines) cover the above in the document, and this is insufficient.</p> | <p>Agreed. Additional information relating to water use will be included.</p> |
| <p><u>Sewerage infrastructure</u> In reviewing this chapter, our Water Quality Officer has identified some general points on sewerage infrastructure and the Urban Waste Water Treatment Directive. These comments may</p> | <p>Noted. The information has been passed to the local authority.</p> |

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| <p>be of interest in the SEA, and we wish to include theme here in any case for the benefit of the LPA for other forward planning matters:</p> <p>Relevant to water quality, and development emerging as a result of the Local Development Framework, is sewerage. For any proposed development areas, Stroud District Council should undertake consultation with the water company to ensure there is capacity at the receiving sewage treatment works. We have identified that there is no capacity available under the current discharge consents for Coaley Sewage Treatment Works (STW) and Stroud STW, but these works may have schemes to increase the flow under the Periodic Review 2009. Consultation with the water company should identify any other STWs that are close to full capacity and where low dilution in the receiving watercourse may restrict further effluent being discharged.</p> <p>In addition to sewage works, the sewerage system should be considered; storm overflows and sewage pumping stations could be affected by development resulting in more frequent discharges of sewage to rivers. The water company should be able to provide information on likely capacity issues within the sewerage system as a result of further development. There should be no unplanned increases of sewage from existing storm overflows and no new storm overflows as a result of new development.</p> <p>Also for information, the Gloucester Sharpness Canal, the River Cam and the River Frome are designated Sensitive Areas (eutrophic) under the Urban Waste Water Treatment Directive. These watercourses have been found to have high levels of phosphorus. The Directive requires large sewage works discharging to these sensitive areas to reduce the phosphate concentration of their effluent. Phosphorous can lead to excessive plant growth and decay (eutrophication) and can damage fish and habitats.</p> | |
| <p><u>Biodiversity</u> Our Fisheries, Recreation and Biodiversity Officer has reviewed the water and biodiversity sections of the report and has made comprehensive comments on a range of issues. Some of these relate directly to the report, and some make more general comments for consideration by the Council in their forward planning. I have therefore included these comments in their entirety as a separate document for your consideration, Please read these alongside our comments on the water and biodiversity sections.</p> | Noted. |
| <p><u>BIODIVERSITY</u></p> | Noted. |

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| <p>Introduction We generally concur with the introduction and are pleased to see that climate change has been included as a main threat to both local and global biodiversity in Para 15.1.3 as previously suggested.</p> | |
| <p>Environmental Protection Objectives Whilst we note Sections 15.2.6 – 15.2.9 have all been added, we feel this section should also make reference to the Salmon and Freshwater Fisheries Act (SAFFA) 1975. Moreover there is shortly going to be a major overhaul of fisheries legislation (Marine Bill) there is going to be a significant change to the requirement for fish passage, fish passage provision is going to be extended to all fish species and not just migratory salmonids. This legislation is likely to be enacted before completion of this document and certainly the process.</p> | <p>Noted. Advice from the Environment Agency will be sought with regard to the relevance of this to Stroud and where necessary changes will be incorporated.</p> |
| <p>Context Review We are disappointed to see that the Context Review still appears to have missed the methodology of protect and enhance as advocated in PPS1 and highlighted in our previous correspondence. Therefore we would still reiterate those comments made in our previous response:</p> <p>“The Context Review in 15.3 seems to miss the methodology of ‘protect <i>and enhance</i>’ advocated in PPS1, and the ‘avoid, mitigate, compensate’ methodology of SEA. These are particularly relevant where there is a conflict between use of brownfield land and ecological interest/assets often associated with such sites. Mention should therefore be made of this specifically in the rows relating to PPS9 in the table.</p> <p>In addition we feel the wording of those rows where the Evidence Source refers to PPS9 are quite negatively worded.</p> | <p>Noted. Reference to PPS1 will be added to the Context Review.</p> <p>The review of PPS9 accurately reflects its contents.</p> |
| <p>Baseline Habitats We welcome and agree with the inclusion of Sections 15.4.9-15.4.11 which have all been added to the report.</p> | <p>Noted with thanks.</p> |
| <p>Geodiversity We note and welcome that the Local Geodiversity Action Plan (LGAP) is being undertaken.</p> | <p>Noted.</p> |
| <p>Likely Future Conditions We note the addition of Section 5.5.2 and the additional sentence in the last paragraph of Section 15.6.1 which relates to the potential Severn Estuary tidal power scheme and would</p> | <p>Noted.</p> |

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| <p>reiterate our comments about caution as made earlier in the climate change section of the letter. However, we welcome the fact that the text reflects the need for the scheme to be subject to an appropriate assessment, as to not cause any unacceptable damage to the conservation value of the estuary.</p> | |
| <p>WASTE</p> <p>Please note we have significant concerns about the waste trends for Stroud as shown in the report. We wish to draw attention to this as a serious issue, and one that the LDF will need to play its part in resolving by delivering robust policies. Our concerns are explained in the following sections on the waste chapter.</p> | Noted. |
| <p>Introduction</p> <p>It should be noted that the Waste Management Licensing Regulations mentioned in 17.1.1 have been replaced by the Environmental Permitting Regulations which came into force on 6 April 2008, as indicated earlier in this letter. In paragraph 17.1.2, reference is made to agricultural waste - the Agricultural Waste Regulations are now in force and therefore there is a need to factor in potential future requirements for additional treatment capacity for biowaste by the County. There is also the fact that local authorities are increasingly looking at separate collection of food waste, whilst National Government is encouraging biowaste management in the battle against climate change.</p> | Noted. The text will be updated to reflect the change in legislation. |
| <p>Environmental Protection Objectives</p> <p>In section 17.2, all reference to targets is made to the Waste Strategy 2000 - the Government published the Waste Strategy for England 2007 on 24 May 2007 (http://www.defra.gov.uk/ENVIRONMENT/waste/strategy/). This sets out the vision for sustainable waste management and has set higher targets than those in the 2000 report, therefore this section needs to be updated. The Government also published a consultation on incentives for recycling by households together with a partial Regulatory Impact Assessment and associated research report. There is a section for what the Waste Strategy means for local authorities (http://www.defra.gov.uk/environment/waste/strategy/factsheets/whatitmeans.htm#localauthority).</p> <p>We are pleased to see that you have now referred to the proximity principle in Para 17.2.2, however we still feel it would be useful to actually state the name of the principle, the waste hierarchy, as both the proximity principle and the waste hierarchy are environmental protection objectives as stated in our previous response.</p> | <p>The text will be amended to reflect the updated Waste Strategy report.</p> <p>The Scoping Report contains data relating to the topic, which includes the amount of waste collected per person in the District. The current and future trends relating to waste production are briefly discussed. It is not appropriate to discuss ways in which to contribute towards waste reduction – this is more appropriate within the appraisal of policies.</p> |

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| <p>We consider there is not enough emphasis on the minimisation of waste arisings in the waste chapter. The onus is more on the increasing of recycling rates and the diversion of waste from landfill. Although we obviously support this, there is a need to minimise waste arisings in the first instance, e.g. through home composting schemes and re-use of waste, as this is the most sustainable environmental option.</p> <p>A useful question to ask would be to focus on whether the use of waste as a resource can be increased within the District. An example indicator could be the percentage of waste actually fully recovered rather than landfilled or sent through the Civic Amenity sites. This could be further broken down to show how the waste has been put to use, for example for energy generation, or reprocessing into finished products. This would help the Council look at how the waste that is produced within the District is ultimately put to use, although the destination where the waste is finally recovered or put to use might be outside of the District.</p> | |
| <p>Context Review We note and welcome the inclusion of the extra sections from row 9 onwards in the revised report.</p> <p>There is no mention of the WEEE Directive 2002/96/EC and 2003/108/EC. This Directive has an impact on the District as there is a responsibility to provide Designated Collection Facilities to allow the public to dispose of their WEEE (Waste Electrical and Electronic Equipment) for recycling. Although this happens, in practice, already within the District, we suggest it should be included for completeness.</p> | <p>No action. The implications of the WEEE Directive are unlikely to change as the local authority has already met its requirements. It is therefore considered to be inappropriate to include it within the context review.</p> |
| <p>Baseline We previously expressed concern over the statement in Para 17.4.1 which states that the Council had little direct control over the amounts of household waste being produced per person in Stroud, thus contributing to the District failing to meet the government's objective on waste reduction. We still do not concur with this statement and feel there is scope to have a positive impact on this issue through examples as outlined in our previous response. Therefore we would still suggest "<i>limited</i> direct control" would be more appropriate wording.</p> | <p>Noted. The text will be amended.</p> |
| <p>Likely Future Conditions We note that the statement in Para 17.5.1 indicates that the amount of waste generated has stabilised. Previously the amount of household waste produced per person in Stroud was actually rising. It is still very concerning that this figure is not actually falling and we consider this</p> | <p>Noted. Amend Section 7.4 to better reflect the current situation. It is not possible to ascertain within the Scoping Report why targets are not being met, however, the Council have identified waste as an important issue for</p> |

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| <p>to be a significant issue.</p> <p>Although it is acknowledged that waste is primarily a matter dealt with by Gloucestershire County Council, there are some waste issues that are relevant for Stroud District Council, namely waste collection. In section 17.4.1 reference is made to "wasteful individual behaviour" - surveys have shown that householders would recycle more if they had better kerbside collection schemes in their area. We would question what is the District Council doing to encourage their householders to recycle more waste? Waste collection systems which aim to minimise waste at source should be adopted throughout the district, and separate collections of recyclable and compostable materials introduced. It is indicated in section 17.5.1 and 17.6.1 that it seems the government's targets for recycling and composting will be not achieved, however it is not clearly stated why this is. We would question what measures the Council are taking to try and achieve these figures, and why it is suspected they will not be achieved? This is particularly concerning to the Environment Agency, as the figures this section relates to are less than those in the 2007 report which should be improved upon.</p> <p>As highlighted in PPS10 waste should be considered as a resource. The active management of waste should see it pushed up the 'waste hierarchy', with disposal a choice of last resort. Therefore, we would support the diverting of increasing amounts of waste from landfill through increasing recycling, re-use and recovery of materials. Efforts must be made to reverse the growth in waste, recover the maximum resource value from the waste produced, and accelerate progress in delivering increased waste management capacity by the County.</p> | <p>the District.</p> |
| <p><u>HOUSING</u></p> <p>We have not made a detailed assessment of this chapter, however we would wish to highlight and comment on a conflict of planning matters/interests in relation to "brownfield" sites. We also have comments to make on water resources and housing.</p> <p><u>Brownfield sites</u></p> <p>We have some concerns on the conflict between the principles set out in national government planning policy, in particular PPS3 in relation to re-use of brownfield sites (as outlined in chapter 9 of the document) and PPS25 in relation to achieving sustainable development that is appropriate in respect to flood risk and future climate change.</p> <p>This contradiction would appear to be potentially more focused within the Stroud Valleys and</p> | <p>No action. The conflict between the principles set out in PPS3 and PPS25 cannot be influenced by the SA or the LDF.</p> <p>The potential biodiversity interest of brownfield sites is acknowledged in the context review.</p> |

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| <p>therefore some guidance on how the council would likely deal with this issue in relation to the requirements of the South West Regional Spatial Strategy would be welcomed.</p> <p>The re-use of brownfield sites can also present problems for biodiversity as depending on a site's location and the length of time it has been unoccupied, there may be valuable flora and fauna that has colonised the area. We highlight this matter as it is important to consider the merits of the various types of 'brownfield' sites; they can be both re-development options and valued open space or habitat. It is important that plans and policies make this distinction/include flexibility in this regard.</p> | |
| <p><u>Water resources and housing</u></p> <p>In addition to our comments made on water resources in the water section, we also have the following comments on water resources relevant to the Housing section:</p> <p>We note that in the third section of Table 9.2.1 it states "New homes need minimum standards for energy efficiency and water efficiency".</p> <p>It would be more appropriate for the government's standard of usage of 105 litres of water per day for new houses being set as the target for water consumption in all new housing. We would also expect to see reference to:</p> <ul style="list-style-type: none"> a) Rainwater Harvesting. b) High efficiency dual flush loos, low flow taps and shower hoods c) High efficiency white goods being installed. | <p>No action. The Context Review contains an overview of the contents of the various documents and it would be inappropriate to include more detail given the complexity of the Code for Sustainable Homes ratings in relation to water.</p> |
| <p><u>The NEXT STEPS section</u></p> <p>With regard to this section I would like to reiterate those comments made in our previous response as again detailed below:</p> <p>Paragraph 18.3.1 makes reference to the SA Framework. The Scoping Report produced is a good starting point for identifying issues, baseline and objectives. However it has not set out the results in a SA Framework. We would expect the production of a SA Framework to be the next step and would wish to be consulted on the Framework in its draft format before it is used to assess the plan objectives and LDDs.</p> | <p>The SA framework comprises the SA objectives and indicators. The SA Scoping Report is a means by which to outline the SA framework, which will be developed throughout the SA process. The EA, as a statutory consultee, will be consulted throughout the process.</p> |

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| <p>In addition, the SA Framework should more specifically identify trends and target indicators. We hold various information and data sets (such as Flood Zone Maps, water quality information, Catchment Abstraction Management Strategies (CAMS), State of the Environment Reports and data on the amount of EA objections to planning applications on flood risk) which may be of use in identifying trends and target indicators, and in the monitoring process. We note that you have already made use of some of this information, and would be happy to supply further information on request.</p> | |
| <p>Section 18.4.1 states that 'SA reports will be produced for each LDD'. This is appropriate, however we would stress the need to appraise LDDs for their sustainability criteria in conjunction with and alongside the production of the LDD itself. The SA process should be an informative process, and not done in a retrospective, 'add-on' or 'after-thought' way.</p> | <p>The SA process will be undertaken iteratively alongside the development of the LDDs.</p> |
| <p>Section 18.4.2 on what the reports will consider should add the following requirement:</p> <p>"Ways in which positive impacts can be maximised and negative impacts can be avoided, mitigated and/or compensated."</p> | <p>Noted. The text will be amended as appropriate.</p> |
| <p><u>The INTRODUCTION section</u></p> <p>Finally we previously made comments that the introductory sections of the report were quite general and as a result were not locally relevant. We are therefore pleased to see that our comments have been taken on board and that Para 1.3 now provides a good overview of the area and its characteristics and helps to provide the link between the relevant baseline sections showing how the issues relate to each District.</p> | <p>Noted.</p> |
| <p>Environment Agency - Biodiversity</p> | |
| <p>WATER</p> <p>Some comments relating to this section could be best/equally applied to the section on Biodiversity and vice versa</p> <p>We welcome references to the Water Framework Directive 2000. It would be appropriate to make specific reference to some of the constraints to the reaching of "good status" by 2015, in particular the physical targets that are characteristic of this District.</p> | <p>No action. The Environmental Protection Objectives section outlines the requirements of legislation. It is not appropriate to discuss how such requirements might be achieved.</p> |
| <p>In addition to the problems identified in 14.6.1 The following problems need to be addressed somewhere in the document and/or the process.</p> <p>By virtue of its geology, gradient and catchment characteristics the principal watercourses of</p> | <p>Noted. The text will be updated.</p> |

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| <p>Stroud District and their tributaries are of high environmental value with a good variety in physical habitat. However conductivity with their headwaters and ultimately the River Severn pSAC/SPA/Ramsar/SSSI has been impaired through historic industrialization. There are a large number of obstructions to the movement of aquatic and riparian wildlife notably weirs and culverts</p> | |
| <p>The Environment Agencies expectations for re-development alongside watercourses in the Stroud District expect the catchment context to be respected We will be actively seeking the de-culverting and naturalisation of watercourses and its tributaries as part of re-development in this area. This will also promote the re-creation of wildlife and amenity links along the Frome.</p> | <p>Noted. Reference will be made to the need to take a holistic approach in relation to redevelopment and watercourse catchments.</p> |
| <p>Our response to planning consultations and the determination of our own licences and consents are informed by our duty under the Environment Act 1995, to protect and enhance the water environment and land associated with it, including flora, fauna and natural beauty. We are also guided by the Agencies culverting policy, which promotes the opening up of currently culverted watercourses.</p> | <p>Noted.</p> |
| <p>In order to comply with the water framework directive the Agency should not consent works that cause deterioration in water status. This includes ecological as well as chemical standards and includes the regulation of any activities that lead to biological changes e.g. morphological impacts (altering the physical shape of water bodies and physical structures in the river channel) or changes in rates or volumes of flow. Taking the opportunity to protect and enhance waterbodies through redevelopment will help fulfil the obligation to restore good ecological status under the water framework directive by 2015.</p> | <p>Noted.</p> |
| <p>Sustainable re-development offers a significant opportunity to enhance these watercourses. Restoring continuity by opening up culverted stretches and creating generous buffer zones on both banks improves the functioning of the river and its corridor. As well as gaining open water habitat the free movement of fish and other aquatic wildlife is enhanced. A more naturalised corridor will also benefit riparian wildlife and improve flightways for bats and birds.</p> | <p>Noted.</p> |
| <p>Sufficient space will need to be provided between proposed buildings and the watercourse to ensure a safe, attractive and wildlife friendly corridor with adequate access for maintenance. In the event that finished floor levels need to be raised to an appropriate level above identified flood levels it is important that land levels are not raised adjacent to any watercourse and a lower corridor is retained or created. Maintaining a more naturalistic topography will help maintain or enhance the character of the river corridor. Moreover lower river walls or banks enable better views and enjoyment of the water environment.</p> | <p>No action. This is an issue for development control.</p> |

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| <p>Diversions</p> <p>A re-opened culvert would not necessarily need to be on the same route. We would expect an environmentally sympathetic diversion of the watercourse including variety in planform, cross section, channel width, depth and flow characteristics. Any FRA would need take into account a more complex channel design i.e. a naturalistic meandering or sinuous channel, with variety in bank gradient and cross-section.</p> | <p>No action. This is an issue for development control.</p> |
| <p>New Culverts</p> <p>Any access culvert would need to be the shortest length practically possible. In order to minimise the impacts to fish and aquatic wildlife the culvert invert will need to be at least 300mm below design bed level. A minimum water depth of 300mm will need to be maintained and flow will need to be less than 1-1.5m/s. The Highways Agency design manual for Roads and Bridges provides appropriate advice for facilitating otter movement through bridges and culverts. Mitigation for otters should also include bankside cover and habitat improvements aimed at increasing fish density and numbers.</p> <p>Under the Land drainage Act Stroud District Council as Drainage authority has the same duties to protect and enhance the water environment as the Environment Agency. Moreover it has duties under the NERC Act to Biodiversity and priority species.</p> | <p>No action. This is an issue for development control.</p> |
| <p>Suds</p> <p>We agree that 14.5.5 Water efficiency is fundamental for inclusion in future new developments in Stroud and that Grey water recycling solutions and water conservation measures are required. In addition there needs to be specific reference to Suds</p> <p>The philosophy of SUDS is to replicate, as closely as possible, the natural drainage from a site before development' – The SUDS Manual CIRIA C697. Utilising Source Controls, infiltration, water reuse, attenuation and treatment to reproduce, as far as possible, the natural hydrological response pattern and water quality generated by the undeveloped site should include open attractive conveyance elements and `landscape nodes`. Pipes should be used sparingly and not as the main conveyance mechanism. Permeable surfaces, including green roofs, permeable block paving, permeable asphalt, bioretention cells, bio-remediation features and under-drained swales, all provide effective primary treatment in the 'management train'.</p> <p>The SUDS Management Train principle requiring minimisation and source controls will need to be explored and exploited before "downstream" attenuation / treatment systems are considered. The use of soakaways should not be dismissed prematurely, on the grounds that the soil is</p> | <p>No action. This is an issue for development control.</p> |

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| <p>unsuitable as uncontaminated soil has a capacity for absorbing water, the only question is how much and how quickly. Ignoring or bypassing natural soil infiltration will almost certainly compromise a holistic objective of maintaining natural runoff characteristics.</p> <p>Lowtech, decentralised primary treatment for example distributed storage and treatment at household level, can reduce the size of downstream conveyance. It also improves the value of amenity features, untreated, silty and polluted runoff being unsightly.</p> | |
| <p>BIODIVERSITY (INCLUDING FLORA AND FAUNA)</p> <p>Although section 15 Biodiversity acknowledges in the introduction that Biodiversity has high economic and social values e.g. in leisure and recreation or tourism, and educational, aesthetic and spiritual value, and so enriches our quality of life and helps determines the distinctive character or 'feel' to an area, this is not specifically referred to in other sections of the document. We would wish to see clearer explanation of the interrelationship between the relevant factors for example:</p> <p>There is a greater variety of policy and guidance on the links between Human health and the green environment than have been referred to. We welcome the Environmental Protection Objectives 4.2 to support and develop a coordinated approach to green spaces use throughout Stroud District and the development of a programme of physical and mental well-being health initiatives via a multi agency approach. However we suggest inclusion in 4.6 Environmental and Sustainability Problems and 4.7 Proposed SA / SEA Objectives measures which allow for</p> <ul style="list-style-type: none"> • The need to provide more alternative and safe routes for walking and cycling in the District • Access to green spaces and the enjoyment of Biodiversity should be improved. | Noted. The text will be updated as appropriate. |
| <p>Similarly Crime and Safety can be influenced by a strong sense of place and community pride which are intrinsically linked to the quality of the natural environment.</p> | Noted. |
| <p>Key Messages from the Context Review Evidence Source</p> <p>Baseline habitats and species that have not been specifically referred to but will need addressing in the documents and/or during the process include the following.</p> <p>The district is drained by a network of environmentally sensitive watercourses supporting native brown trout populations, bullhead, native white clawed crayfish and otter. A number of the structures are known to be used by species such as nesting dippers and grey wagtail and the bankside trees, shrubs and vegetation will be used by a variety of nesting birds. Bats will be using bankside trees and structures with suitable holes and fissures for roosting and the corridor</p> | Noted. The text will be updated as appropriate. |

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| itself for foraging. This is despite the numerous pressures that it has been subjected to for example culverts and weirs, the modification of which offer significant opportunities for enhancement. | |
| Section 15.2 Environmental Protection Objectives should also make reference to the Salmon and Freshwater Fisheries Act (SAFFA) 1975. Moreover there is shortly going to be a major overhaul of fisheries legislation (Marine Bill) there is going to be a significant change to the requirement for fish passage, fish passage provision is going to be extended to all fish species and not just migratory salmonids. This legislation is likely to be enacted before completion of this document and certainly the process. | Noted. Advice from the Environment Agency will be sought with regard to the relevance of this to Stroud. |
| The native white Clawed crayfish has persisted in reasonable numbers in tributaries of the Frome and the Little Avon. | Noted. The text will be updated as appropriate. |
| Otters started to re-colonise the lower Severn catchments in the early 1990s. There has been a steady low level of activity and some consolidation since then. Gloucestershire is an important stepping stone for their expansion and recovery. All watercourses in the area need to be treated as if they are potentially used by otters. Otters are known to be using the Frome catchment as evidenced by positive records in the national otter survey and dead otter records. | Noted. The text will be updated as appropriate. |
| Enhancements for otters should include restoring connectivity in watercourses such as the Painswick stream and its tributaries. Opening culverts is very beneficial and providing a ledge for otters to pass through at higher flows significantly reduces road deaths. This can be formed from existing material within the culvert or river, or be a fitted structure (recommendations for otter ledges can be found in the Design Manual for Roads and Bridges, vol. 10, section 4, part 4). However given the restrictions in culvert capacity that is driving these works this is unlikely to be practical in this phase of the works. Introducing bankside cover and habitat improvements aimed at increasing fish density and numbers are also meaningful mitigation for otter. | Noted. The text will be updated as appropriate. |
| <p>Problem Introduced Species</p> <p><u>Alien Crayfish</u> The American signal crayfish is known to be present in low numbers on the Lower Frome and the Toadsmoor stream.</p> <p>Giant Hogweed Giant hogweed, listed listed under Schedule 9 to the Wildlife and Countryside Act 1981 As such it is an offence to plant or otherwise cause this species to grow in the wild. Controlling the giant hogweed would represent a significant environmental enhancement.</p> | Noted. The text will be updated as appropriate. |
| Habitats | Noted. The text will be updated as appropriate. |

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| <p>Suggest 15.4.2 is amended to read Stroud falls within two `Natural Areas`:</p> <p>15.4.4 The lists Habitat and Species Action Plans for Gloucestershire in Appendix 4 should be updated to include recent updates with reference to the list of `Priority Species` and make clear whether these are national and/or local BAP action plans.</p> <p>The references to the Protected status of the Severn Estuary are incomplete. Although Section 15.4.5 acknowledges that part of it is an internationally recognised Ramsar site. Table 15.1: 'European' sites in Stroud` as well as highlighting its SPA status needs to make reference to the fact that an even larger part of the estuary is an SAC and Table 15.2: Status of SSSIs in Stroud its SSSI status.</p> <p>It should also be borne in mind that the habitats regulations allow tributaries</p> | |
| <p>Tidal Power Scheme In The Estuary</p> <p>There are a number of references to the Government study into the feasibility of a tidal power scheme in the Severn Estuary. Section 15.4 states that if constructed the tidal power scheme would work by creating a barrage across the estuary effectively converting it into a hydroelectric dam. Although it is fair to say this is principal option being considered it is only one of the potential options under review. Moreover there are other tidal power options which should be being considered which for example consider the costs, benefits and impacts of tidal flow as well as tidal range power scheme would have. Whilst this document is not the place to detail the full debate a more balanced view should be presented.</p> <p>Section 15.4 states the tidal barrage option would have to meet the legislative requirements of the EU Habitats and Birds Directive and the feasibility study is examining if, and how, a tidal power scheme in the Severn Estuary could comply with these requirements. In our view it will not be possible for the barrage option to comply with the habitats regulations.</p> | <p>No action. The Scoping Report reflects the current situation in relation to the feasibility study being carried out.</p> |
| <p>SSSIs</p> <p>The interpretation that the most common reason for the unfavourable condition of the SSSI's is likely to be a lack of appropriate management is accurate but oversimplifies the problem. For example an issue of relevance to the LDF is that barriers to the management of high conservation value grassland as part of viable agricultural enterprises include the risks or disturbance to stock, farming operations, infrastructure and equipment from vandalism, trespassing and increased recreational usage which can result from the adjacent developed land</p> | <p>No action. Such issues are for development control to consider when determining a planning application.</p> |

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| <p>uses. Fragmentation and isolation from other parts of the holding can also impact on the viability of farm businesses as impacting on the management options to maximize conservation value. Grazing is an essential requirement for maintaining the value of the target grassland habitats. It is also important that the grazier of lowland grassland of high conservation value have higher land available to move stock to in the event of a flood.</p> | |
| <p>The impacts on food security for the uk and the impacts on loss of productive land, local to a large conurbation, on the current and future potential to increase local production and reduce `food miles` also need to be adequately assessed in the SEA.</p> | <p>Noted. Soil resources are considered in Section 13, which will be updated to include reference to the issue of `food miles`.</p> |
| <p>Key Wildlife Sites We are concerned that section 15.4.8 undervalues the role and importance of Key Wildlife Sites. They certainly receive inadequate legal protection but the statement that they have no legal protection could be misleading as they have generally receive some protection through the planning process and may include protected species.</p> <p>We would welcome clarification on whether Stroud is using Indicator 197 as a measure of its performance for biodiversity by assessing the implementation of positive conservation management of Local Sites? According to http://www.hm-treasury.gov.uk/media/1/3/pbr_csr07_psa28.pdf securing a healthy, resilient, productive and diverse natural environment is a key Defra priority as enshrined in the Government's Natural Environment Public Service Agreement (PSA) to "<i>Secure a healthy natural environment for today and the future</i>". The Government wants to see biodiversity valued, safeguarded and enhanced. Biodiversity benefits are highly dependent on local action because biodiversity is ultimately lost or conserved at the local level. Therefore Local Authorities (LAs) have a key role to play in conserving biodiversity.</p> | <p>The text relating the Key Wildlife Sites will be amended to reflect the fact that they may contain protected species. The planning system does not offer legal protection as PPSs are policy statements as opposed to legislation.</p> <p>Update Chapter 15 to make reference to NI197.</p> |
| <p>Wider Countryside Although there is a thorough description of protected sites and species it is important that more explicit reference is made to the value of the wider countryside and fact that many habitats of value are unprotected. Moreover what is considered common today could very rapidly change in status for example the recent elevation of toad and eel to BAP species.</p> <p>The reference to the Gloucestershire Nature Map created by the Gloucestershire Biodiversity Partnerships goes somewhat towards that but</p> <p>We welcome the Proposed SA / SEA Objectives</p> | <p>Noted. The text will be updated where appropriate.</p> |

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| • To conserve and provide enhancement of the natural environment and biodiversity | |
| Canal There are rightly numerous references to the Canal restoration. Whilst we welcome the Restoration of the canal towpaths as part of the sustainable transport infrastructure there should also be reference to the rest of the right of way network. | Noted. The text will be updated where appropriate. |
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