

[REDACTED]

From: [REDACTED]
Sent: 14 February 2019 12:41
To: _WEB_NDP Consultation
Subject: FW: Minchinhampton Neighbourhood Development Plan - Notice of Publication

Hello [REDACTED]

Thank you for consulting Gloucestershire County Council (GCC) on the Minchinhampton Neighbourhood Development Plan. I have the following officer comments to make.

Ecology Comments

We can see that the main biodiversity constraints have been identified (Appendix 4) and taken into account in formulating the plan. The main themes include two on the natural environment with one having special reference to biodiversity (paragraph 2.29). We see that Section 3 covers the natural environment including nature conservation (3.15 to 3.30).

We notice one important typo at paragraph 3.22 needs correcting. This is because Key Wildlife Sites (KWSs) are only notified 'to' rather than 'by' the Local Planning Authority. However the Local Planning Authority can influence the designation of new sites if it can provide good evidence.

Some but not all NPPF references have been updated in the plan. At 3.26 of the NDP the old 2012 NPPF paragraphs need changing to the new 2018 NPPF paragraphs of 174 and 175.

It is welcomed that policies MP Env 3 and MP Dev 1 promote nature conservation and its enhancement.

Flood Risk Management Comments

GCC would like to see specific mention of flood risk (surface and ground water primarily) and an accompanying policy statement. Whilst the parish is predominantly flood zone 1, it is bordered to the west, south and north by flood zones 2 and 3 (Nailsworth stream, Gatcombe Water and Frome) so the potential impacts of development (particularly in the north) are very real. Also, there is some good Natural Flood Management work underway in the Stroud area, which the plan should acknowledge.

The following are suggested amendments.

- 2.6: Add a constraint, "Flood Risk: Surface water flows, infiltration, groundwater, springs, watercourses."
- 2.29: Under 'development and urban conservation' extra bullet – "Managing the impact of development on flood risk"
- Ch4: Separate section on flood risk management – five paragraphs: "policy context – NPPF, Stroud Local Plan / flood zones and current risks / intra and inter-parish impacts / sustainable drainage systems in development areas / natural flood management on predominantly rural watercourse upstream of development"
- Policy MP Dev 1 New Development: Extra bullet – "Demonstrates adherence to the principles of Sustainable Drainage Systems (SuDS) and mitigates impact on flood risk".

If you would like to discuss any of the points raised above please do not hesitate to contact me.

Yours sincerely

[REDACTED]
Planning Officer