

[REDACTED]
Stroud District Council
Planning Policy
Ebley Mill Ebley Wharf
Stroud
Gloucestershire
GL5 4UB

Our ref: SV/2018/110073/CS-
03/IS1-L01

Your ref:

Date: 16 December 2020

Dear [REDACTED]

Stroud Additional Housing Options Consultation Paper - October 2020

Thank you for consulting us on the Stroud Additional Housing Options Consultation Paper. We have the following comments and advice on matters within our remit:

Evidence Base and Potential New Sites:

As referred to on our previous comments on the Local Plan Review, you will of course need to undertake a Strategic Flood Risk Assessment (SFRA) of all sites within the Local Plan. In addition we expect site allocations to be informed by appropriate evidence on water infrastructure (waste water/sewerage and sewage treatment capacity and water resources/supply).

In addition, as a general comment, we would advise that all potential sites should be assessed against a range of data and evidence to ensure that the most appropriate sites are selected. Therefore you will need to (if you have not already), undertake a 'constraint check' of all the potential sites to ensure you are aware of aspects such as floodplain, landfills, Designated Sites, watercourses, culverts, aquifers, source protection zones, etc. This list is not exhaustive and we would refer you to our advice given at the previous Local Plan Review consultation.

The Environment Agency (EA) holds many different data sets for a range of environmental matters which may be of use for constraint checking of sites. All our data is free of charge and much can be obtained online. Here are some weblinks for your use: <https://www.gov.uk/guidance/environmental-data> ;
<https://environment.data.gov.uk/catchment-planning/> ;
<http://apps.environment-agency.gov.uk/wiyby/151365.aspx> ;
<https://environment.data.gov.uk/>

You can also make a data request to us via our Customers and Engagement team at: Enquiries_Westmids@environment-agency.gov.uk .

Whilst we have not undertaken a full 'constraint check' of the sites being considered as part of this Consultation Paper, we would, highlight the following matters for your consideration:

Fluvial Flood Risk:

With regards the proposed potential additional sites listed on page 8 there are a few sites where there is potential interaction with areas of high flood risk, of which the Berkeley ones are a particular concern:

Environment Agency
Riversmeet House, Newtown Industrial Estate, Northway Lane, Tewkesbury, Gloucestershire, GL20 8JG.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

- Moreton Valance/Hardwicke (PGP2), specifically parcels HAR015/016 and HAR006 from the Shorne Brook.
- When taking account of the potential impacts of climate change then the southern boundary of the site at the Whitminster Growth Point (PGP1) may potentially be impacted upon, though there is low confidence in this (The SFRA will need to inform this, and indeed will need to assess the impact of climate change on all sites within the Plan.)
- From the model for the land north west of Berkeley, these two sites (BER016 and BER017) could potentially flood for 250mm to 2 meters for a 1 in 100 year event plus 35% climate change (see map being sent in our covering email, extract from the Flood Risk Assessment for the 'land north west of Berkeley' site). Whilst we cannot say at this stage whether the sites are in the functional floodplain, or contain parts of the functional floodplain within them, they are in Flood Zone 3 (High probability). Accordingly it is important to consider carefully at this stage whether it is appropriate to take forward sites with areas within Flood Zones 2 and 3 and you should, be considering this as part of the Sequential Test (ST) process. If these sites are taken forwards, any development of these sites would require raising finished floor levels a considerable height above the current ground level and floodplain compensation will be needed. However at this stage we have concerns about whether floodplain compensation will be possible / where floodplain compensation could be provided. Accordingly we highlight our concerns at these site and advise they may not be appropriate for residential development. In summary – it is hard to see how these sites would pass the ST. (It should be noted that we do not believe the development at land North west of Berkeley will affect the flood risk at the other sites.)

Environmental Permitting Regulations (EPR) and nearby Waste sites:

There are 2 Environmental Permits (under EPR) within 1 KM of the proposed developments HAR009, HAR008 and HAR007 are with 900m of one Permitted site and WH1014 is within 1km of the second Permitted site. There are also a number of waste exemptions registered in the proposed areas. You may wish to consider any impacts that these sites may have on the potential allocations/future development. Particularly in relation to any increased risk of noise, dust and/or odour emissions that may arise from the routine operation at these sites. Further information on the sites and exemptions registered in this area can be found on the Environment Agency's public register at: <https://environment.data.gov.uk/public-register/view/search-waste-operations>

Spatial Strategy – Climate Change:

We do not normally comment on specific options for spatial strategies other than to say the sites selected should be the most sustainable and informed by appropriate evidence base. However as we all become more informed about the importance of climate impacts it is ever more essential that climate change should, be informing every aspect of the Plan. As such a key driver for reducing carbon emissions and achieving zero carbon development (by 2050 as per the Government's legal requirement, or by 2030 as per Stroud District' policy) is the reduction in the use of private cars and a modal shift towards walking, cycling and public transport. As such, it is likely that a more dispersed pattern of development will perform less well on this objective, than a more concentrated pattern. It is important that the SA/SEA process is used to establish this.

We have not unfortunately been able to review the SA document that accompanies the Consultation Paper at this time, but we would advise that climate change must be at the heart of every aspect of the Plan, and the SA must include meaningful questions and measures to ensure that the radical shift towards zero carbon development that is essential, and enshrined in the NPPF (paras 148-149) and Section 19(1A) Planning & Compulsory Purchase Act, will be delivered through the Stroud Local Plan Review.

I trust the above will assist in helping to shape the spatial strategy and which allocations to take forwards. Please do not hesitate to contact me if you have any queries.

Yours sincerely

[Redacted]

BA (Hons), MSc, MRTPI, PIEMA

Planning Specialist – Sustainable Places

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