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Our Ref: 2020/0314/EIAS

24 November 2020

Dear Sir / Madam,

Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Assessment is Required

Address: Land At, Draycott Crescent, Cam, Gloucestershire.
Application Type: Environmental Impact Assessment
Description: Scoping request for a residential mixed use development for up to 1,100 dwellings, new primary school, strategic landscaping and green infrastructure and other associated infrastructure.

Reasons for decision

Introduction

The Agent, Boyer have suggested that an Environmental Impact Assessment (EIA) is required as part of the forthcoming application for the construction of up to 1,100 dwellings; new primary school; new access points and vehicular, cycle and pedestrian links, strategic landscaping and green infrastructure including areas of informal and public open space and other associated site infrastructure and community uses. Thus, Boyer have submitted a report and asked for a scoping opinion from the planning authority as to the required contents of an EIA. The Council as local planning authority is required to provide a scoping opinion in accordance with Part 4 section 10 of the Town and Country Planning Act. Outlined below is the Councils 'Scoping Opinion' incorporating representations and the opinions of officers.

The Site

The site is 39 hectares (approx.) of primarily agricultural land located north of Draycott, Cam. As shown by the Site Boundary Plan (Appendix 1) contained within the EIA Scoping Report (dated: May 2020), the boundary is an irregular shape.

The site borders the M5 motorway to the north-west, railway line to the north and the A4135 to the east. To the south is Everside Lane and Jubilee Fields. There several public footpaths that throughout the site and agricultural buildings to the north of the site.

Cam and Dursley adjoin each other and make up the District's second largest population. The railway station (Cam and Dursley) is located north-east of the site and is within a short drive by car.

This large conurbation sits nestled at the foot of the Cotswold hills. The Cotswolds Area of Outstanding Natural Beauty (AONB) sits to the south and west of Dursley and is over 1.5km from the site.

The Proposal

It is noted that the Scoping Report specifies the proposed development. For the purposes of this Scoping Opinion, the proposed development will comprise the following key components:

- o Construction of up to 1,100 dwellings;
- o New primary school;
- o New access points and vehicular, cycle and pedestrian links;
- o Strategic landscaping and green infrastructure including areas of informal and public open space;
- o Other associated site infrastructure; and,
- o Community uses.

Consultations:

Natural England notes and agrees with those themes and issues identified for inclusion in the proposed Environmental Statement but also refers the Council to our comments regarding best and most versatile land in Annex A.

We note the substantial uplift in the number of homes to be assessed (up from 700 to 1100). We would expect this to exert significant negative pressure on the site's ability to accommodate suitable mitigation for key themes such as landscape and green infrastructure, for example due to increased housing density. This in turn risks impacts on the scheme's ability to deliver against the emerging plan's core policies. We draw your attention to the landscape related and ecological aspects of the scheme and the opportunity that preparation of the ES offers to incorporate suitable measures to mitigate adverse impacts and enhance the natural environment consistent with the net gain principles described in the revised NPPF. Of particular note are:

- Consideration of the type, scale and location of the application site in terms of the Cotswolds AONB (views from the scarp) and its setting.
- Potential impacts and positive opportunities associated with the application site's location between Woodchester Park SSSI and the Wye Valley & Forest of Dean Bat Sites SAC - two designated sites between which commuting by horseshoe bats has been recorded. Please also see below regarding the role that local rivers have for migratory fish designated as part of the Severn Estuary SAC and Ramsar site. Annex A to this letter provides Natural England's further general advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Historic England state that the site is located in proximity to a number of designated heritage assets including grade II listed buildings.

We also note that it is proposed to use a 1km radius study area for Chapter 8 of the EIA (Cultural Heritage) in order to identify potential receptors. In our view this is not sufficient to identify highly-sensitive designated heritage assets that may become receptors and which are located in prominent positions in the landscape outside of the 1km study area. These include, for example, the Scheduled Monuments recorded as 'Uley Bury Camp' (National Heritage List for England ref. 1004866), 'West Hill Romano-Celtic temple' (NHLE ref. 1002076) and 'Nympsfield long barrow 500m south of Hill Farm Cottage' (NHLE ref. 1007912).

This project thus has the potential to impact on the significance of sensitive, designated heritage assets via a change in setting. The National Planning Policy Framework (NPPF) refers to the conservation and enhancement of the historic environment in section 16. Paragraph 190 refers to the conservation of heritage assets and notes that effects can arise from both a physical change and a change in setting. It is for the local authority to determine the scope of the proposed EIA. However, from the information given and a check of our records Historic England has formed the view that the proposals may result in a loss of significance to designated heritage assets

In line with the advice in the National Planning Policy Framework (paragraph 190), we would expect any Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon the historic environment. In terms of detailed assessment methodology, we would expect any assessment of settings to be undertaken in accordance with our published guidance (HE 2017 [rev] Good Practice Advice in Planning, Note 3, The Setting of Heritage Assets). Similarly, we would expect any over-arching EIA methodology to accord with the guidance given in Highways Agency note 20807 of 2007, commonly known as DMBRB 2.

We also advise that your conservation and archaeology advisers are consulted on this matter. They are best placed to advise on: local historic environment issues and priorities (including access to data held in the Historic Environment Record); how the proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Environment Agency (EA) have provided feedback on general and specific areas of concerns.

CLIMATE CHANGE

We note that there is no specific chapter proposed to be scoped in on climate change. We also note that Energy, Utilities Infrastructure and Waste are all proposed to be scoped out, all of which are important factors in climate change. We do not concur with the Scoping Report that climate change and these related subjects should be scoped out of the EIA. The issue of climate change is considered to be a priority for the proposed development as it potentially has significant environmental impacts.

Climate change has increased in terms of media presence, public scrutiny and general awareness. It is now generally accepted that we face a climate emergency.

Stroud District Council has declared a climate emergency, like many other Councils in the UK, including all those within Gloucestershire. The Council has committed to becoming carbon neutral by 2030 - just 10 years from now. The Environment Agency is also now taking climate change more seriously than ever before. We have committed to being a carbon neutral organisation by 2030. The climate emergency is the most important challenge we face and it must be at the heart of planning and development decisions to help shape climate resilient places now and for the future.

A development of this scale and nature would potentially not even be built out by 2030, so the issue of climate change is considered to be a priority and one that should be scoped in as an individual chapter in the EIA as it potentially has significant environmental impacts.

We consider it is important that for a development of this scale and nature, consideration is given to how the development will mitigate and adapt to climate change across a range of factors. Drainage, hydrology and flood risk are key aspects affected by climate change, as is ecology. However this should also include areas such as waste management, sustainable transport and air quality, sustainable use of materials and resources including water, along with the de-carbonisation of the development and the way in which it minimises the use of fossil fuels. We note some of these other factors are mentioned in the Scoping report and would advise that we do indeed consider they should form part of the ES as a stand-alone chapter.

Achieving carbon neutrality by 2030 will be challenging, and will require bold decisions for planning and place making. The applicant should have regard to the emergency new policy DCP1 for Delivering Carbon Neutral by 2030 in the Draft Stroud Local Plan Review.

It should be recognised that policy, both locally and nationally, is likely to change for this subject area over the course of the planning process, and the build time of the development. We would urge the applicant to give early consideration to approaching the development with high standards for climate change adaptation and mitigation, and not merely doing the minimum required for whatever current policies are in place at the time of any permissions being granted. This approach is likely to stand the applicant/development in good stead for the inevitable up-scaling of policy requirements that will surely ensue as climate impacts become more intense over the next decade.

HYDROLOGY, FLOOD RISK AND DRAINAGE

The proposed development site appears to be located entirely within Flood Zone 1 as shown on our Flood Map for Planning (Rivers and Sea) and defined in Table 1 of sub-section 25 within the Flood and Coastal Change section of the National Planning Practice Guidance (NPPG).

Whilst there are a number of 'ordinary watercourses' located in the site, the catchments for these are too small for them to be included within the national flood map data set. Hence their impacts are likely to be low and be appropriately covered by the standard easements recommended by the SDC drainage department / Lead Local Flood Authority (LLFA), under whose jurisdiction they fall. Nevertheless it may be prudent to undertake modeling of these watercourse if deemed necessary.

There appears to be no mention within any part of the Scoping Report of the required assessment of the impacts of climate change, especially in relation to hydrology, flood risk and drainage, which is a significant omission within the Scoping Report and will need to be rectified. As indicated above, climate change is a significant issues for this development and should be scoped into the EIA, including in relation to flood risk, hydrology and drainage.

ECOLOGY AND NATURE CONSERVATION

Natural England is the key consultee for this issue. From the EA's perspective, our focus for biodiversity is water-related features and species. We recommend the EIA includes a water features survey and linkages are made between the Flooding and Hydrology Chapter and the Ecology and Nature Conservation Chapter to ensure these features are protected and enhanced for their biodiversity value. The development should deliver biodiversity net gain. We would also expect the EIA to include relevant information on the Water Framework Directive (WFD). It should identify any river water bodies close to the site that might be affected by the development (both positively and negatively). The Government is currently committed to improving the quality of our watercourses through the requirements of the WFD. The developer should maximise the opportunities for significant incorporation of features and schemes to improve the quality of watercourses and features. No development should be permitted if it will result in any deterioration in the quality of any water-body. All appropriate measures should be taken to bring about improvements in the morphology and condition of watercourses.

We would expect to see every opportunity taken to naturalise watercourses in and, if appropriate, near to the development site. Existing headwalls should be modified, 'set back' or removed where possible, along with the removal of any other redundant structures, to promote improvements in water quality and create habitat.

If development might lead to a deterioration in water quality and Water Body status, we would expect a Water Framework Directive Compliance Assessment to be submitted with any application. If significant improvement works are planned for watercourses (which we would encourage as detailed above) we would also expect a WFD Compliance Assessment, or at least a Screening exercise for such, to demonstrate no negative impacts of such works, and indeed to make clear the positive impacts to be delivered.

With regard to specific species, given that there are ordinary watercourses within the site boundary, we would where relevant expect the EIA to include assessment of fish including eels, water vole and otters (these being the species the Environment Agency leads on - please refer to Natural England and the County Ecologist for comments on other ecological species and matters.)

It is noted that whilst the draft allocation in the local plan is for up to 700 dwellings, the EIA is scoping for up to 1,100 dwellings. This increase in the scale of the development could have a detrimental impacts on the nature and quality of the Green infrastructure provision including strategic planting and optimum sustainable drainage solutions for the site thus increasing adverse effects on the environment and the quality of the development.

We support the EIA addressing the likely effects after completion / during operation described in section 8.125, as a result of impacts on the water environment. However the assessment of impacts should also make reference to effects on morphology and hydrology as a result of significant increases in impermeable areas and change of land use, including low flows associated with urbanisation. Mitigation of changes to surface water runoff should aim to help naturalise flows in the receiving watercourses notably the River Cam, located to the east of the site boundary, and the tributary of Gilgal Brook to the northwest.

We note, that there are two small ditches still present in the site. The EIA Chapters relating to biodiversity and hydrology should take into account that there are likely to be lengths of piped drainage, the opening up of which could contribute positively to mitigating some of the impacts associated with the proposals.

Section 8.37 describes three areas that hold water for at least part of the year within the site boundary. We consider the value of these existing, and historic and potential features, for amphibians and other wetland wildlife has been underestimated.

A description of the mitigation measures designed-in to the proposed development or proposed to avoid, reduce or remedy the effects of the development on the environment should include the following:

- Retain, and carry out minimal and sensitive management of, existing natural features which act to slow the flow and naturally attenuate water and contribute to habitat richness. This includes the network of hedges, ditches and ponds.

- An exemplar sustainable urban drainage system is designed, located, constructed and managed in such a way as to positively contribute to the nature conservation value and amenity of the site; to improve the ecological quality of the receiving watercourses and make a significant contribution to the Green infrastructure commitments for the site.

- Features such as attenuation basins/infiltration basins are designed to blend into and respond sensitively to the site and enhance the existing landscape rather than just being utilitarian or uniform. Design options and approaches to allow for naturalistic side slopes with a varied gradient slacker than 1:3, diversity in ledge height and width and a permanent water depth of greater than 0.15m. The type and configuration of suds features, including conveyance features such as swales is informed by and doesn't compromise the local biodiversity and landscape context and the constraints and opportunities that presents.

- Ensure there are sufficient stages in the SUDs management train such that the water quality is adequate to support amenity and conservation value of any attenuation pond features. In other words avoid positive drainage and underground attenuation tanks and utilise minimisation and source controls before "downstream" attenuation / treatment systems are considered. The use of soakaways and swales should not be dismissed prematurely, on the grounds that the soil is unsuitable for infiltration. Low-tech, decentralised primary treatment for example distributed storage and treatment at source, can reduce the size of downstream conveyance. It also improves the amenity and conservation value of attenuation pond features which if full of untreated, silty and polluted runoff can be unsightly.

- Given the scale of the development, particularly in combination with adjacent/nearby development and allocations the assessment should where relevant also identify mitigation opportunities and ecological enhancements, directly or indirectly funded, outside the proposed development boundary. These will need to be significant if used to genuinely promote a net gain in biodiversity.

- Ecological enhancements within the proposed development should include reverting arable grassland within the site to permanent unimproved grassland, most logically within well designed multi-functional quality green spaces and linear routes. This would integrate with the existing remnant areas of semi-natural habitat; floodplain meadow and neutral species rich grassland. Strategic planting should be with appropriate native species.

WATER QUALITY

Severn Trent Water Ltd must be consulted in detail on foul drainage proposals. No development should commence until a satisfactory scheme for foul drainage that satisfies all requirements including those of the WFD has been approved. The developer must provide evidence and agreement from Severn Trent that there will be adequate capacity provided within the local sewerage infrastructure (sewer, pumping stations, sewage works). There should not be any increase in the number or frequency of overflows of sewage to watercourses, or a negative impact on treated sewage discharges from STW assets, as a result of this development.

A range of Sustainable Urban Drainage Systems (SUDS) should be incorporated throughout the development and we expect all opportunities to be fully exploited in the scheme so as to ensure no negative impact on water quality and deliver enhancements in line with the WFD. Incorporation of systems both at source (i.e. within footprint of buildings), along pathways (i.e. roads, verges, open areas, footpaths etc) and near to receptors (i.e. near to watercourses) can not only control flows but potentially bring about improvements in water quality, ecology of receiving watercourses.

Whilst water quality is not expected to be a stand-alone chapter, we would recommend that the above points are covered within the EIA in relevant chapters, such as Flooding and Hydrology and Ecology and Nature Conservation.

GROUND CONDITIONS

Published geological maps show the site to be underlain by the Blue Lias and Charmouth Mudstone Formation, classed as a Secondary Undifferentiated Aquifer. This is overlain by Cheltenham sands and gravels over much of the site and is classed as a Secondary A aquifer. The site is not located within a source protection zone for a public supply borehole. We are not aware of any licensed groundwater abstractions within 1km. The applicant may wish to check Local Authority records for any private water supply boreholes.

It is important to establish any historic uses that could have given rise to contamination on a site of this scale, even though for the main part it appears to be a greenfield site in agricultural use. It is noted in the Section on Ground Contamination that there are a number of areas of infilled gravel pits and ponds on the site. There is an historic landfill within the site boundary, to the east of the site. This will need to be considered in the site investigation work planned.

We require a comprehensive preliminary risk assessment as part of the Environmental Statement. The applicant must submit satisfactory information to clearly and reliably demonstrate that the risk from contamination is understood to enable site investigation work to be targeted accordingly. It should address the geology and hydrogeology of the site. Any potential land contamination should be considered, looking at any issues which may be created by the development e.g. oils, piling, temporary works etc.

It is essential to ensure that the site and any risk from contamination is adequately characterised prior to re-development, as there is the potential for disturbance of contaminants resulting in the re-mobilisation of contaminants that can leach to groundwater. Issues such as ensuring remediation of any contamination, selection of appropriate foundation design, appropriate decommissioning of any groundwater boreholes/wells (from site investigation work) and disposal of drainage must also be considered. Consideration should be given to the on site boreholes/wells, and whether they are to be retained or decommissioned if they are not intended to be used.

The following issues need to be considered in the Environmental Statement:

- Site setting- aquifer, depth to groundwater etc.
- Hydrogeological conditions and water resources, decommissioning of any on site wells.
- Land contamination issues associated with former or existing land uses, should the desk study highlight any areas of concern across the site.
- Foundation/piling work - potential for contaminant migration pathways, disturbance of groundwater flows/levels.
- Foul drainage
- Surface drainage
- Fuel storage (if any is intended, e.g. during construction)
- Waste

We recommend that developers should:

1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
2. Refer to the Environment Agency Guiding principles for land contamination for the type of information that we required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.

3. Refer to the EA groundwater protection position statements in relation to SUDS, located here: <https://www.gov.uk/government/publications/groundwater-protection-position-statements> . In particular G10 "Developments posing an unacceptable risk of pollution" and G13 "Sustainable drainage systems".

ENVIRONMENTAL PERMITTING REGULATIONS

There are two sites/facilities with Environmental Permits (EPs) within 1-1.5km of the proposed development and a number of Waste Exemptions registered in the vicinity. EPs and Waste Exemptions are requirements of certain sites/facilities/activities under the Environmental Permitting Regulations (EPR). The applicant should consider any impacts that these sites/facilities may have on the proposed 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. Where relevant these impacts should be included in the EIA. Further information on the EPs 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>

Highways England have provided feedback on general and specific areas of concerns.

General aspects to be addressed in all cases:

- An assessment of transport related impacts of the proposal should be carried out and reported as described in the current Department for Communities and Local Government (DCLG) guidance on 'Travel Plans, Transport Assessments and Statements in decision-taking'. Reference should be made to Highways England policy requirements set out in Circular 02/2013.
- Environmental impacts arising from any disruption during construction, traffic volume, composition or routing change and transport infrastructure modification should be fully assessed and reported, along with the environmental impact of the road network upon the development itself.
- Adverse changes to noise and air quality should be considered, including in relation to compliance with the European air quality Limit Values and/or Local Authority designated Air Quality Management Areas (AQMAs) and World Health Organisation (WHO) criteria.
- Works in the vicinity of the SRN should be scheduled to avoid coinciding with other construction projects in order to limit the level of disturbance to the network.
- No new connections are permitted to the Highways England drainage network. In the case of an existing 'permitted' connection, this can only be retained if there is no land use change.
- Development must not lead to any surface water flooding on the SRN carriageway.

Location specific considerations:

- Any application will need to be supported by a transport assessment which should consider the impact of the proposal on the operation of the SRN, including during the construction phase - in this case the M5 J13 to the north and J14 to the south - in line with the guidance contained within National Planning Practice Guidance and DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development. Any adverse impact will require appropriate mitigation to be provided in line with current guidance.
- The adopted Stroud Local Plan is currently under review, with a Section 18 consultation having recently been undertaken. The infrastructure requirements for the emerging Local Plan are yet to be determined. The site is currently proposed as a draft strategic allocation (site PS24 - West of Draycott) comprising up to 700 dwellings, primary school, strategic landscaping and green infrastructure and associated community and open space uses. It is noted that the proposals outlined in the scoping opinion request differ to the draft allocation by increasing the housing numbers. We therefore consider this application to be premature in regard to ensuring that the infrastructure requirement for the site are integrated and coordinated with the overall transport strategy. This would require that the site's impact be considered cumulatively with the other development allocated in the emerging Local Plan;
- If an application is to be submitted prior to the completion of the Local Plan review, the effects of the proposed development should be assessed cumulatively with other schemes and we would expect the applicant to agree an appropriate list of relevant other schemes, including committed development in the area, with the Council and Highways England;
- As the site abuts the Highways England estate, Highways England will need to be consulted on any proposals which have a potential impact on the integrity of the infrastructure asset, including boundary treatment, noise fences, screening and other structures (E.g. bunds). As contained in Annex A, section A1 of DfT Circular 02/2013, these must be erected on the developer's land, and far enough within the developer's land to enable maintenance to take place without encroachment onto highway land;
- The site layout masterplan should take account of the alignment of the existing motorway and hence not locate any residential properties in such a location that they would be impacted by noise generated from motorway traffic;
- See above points regarding drainage and surface water flooding.

These comments are only advisory, as the responsibility for determining the final scope and form of the EIA Report would rest with the Local Planning Authority.

Highways England's comments imply no pre-determined view as to the acceptability of the proposed development in traffic, environmental or highway terms. Should the applicant wish to discuss the merits of the proposal in terms of the likely impact on the SRN please do not hesitate to contact me.

Highways Development Management (Gloucestershire County Council) has been consulted, however, comments have not been received. The applicant may wish to discuss the merits of the proposal in terms of the likely impact on traffic modelling and cumulative impacts on the local highway network (as appropriate) directly with the Highways Development Management team at GCC.

Lead Local Flood Authority (Gloucestershire County Council) has provided comments below. The LLFA is a statutory consultee for surface water flood risk and management and has made the following observations.

The development does have the potential to adversely impact flood risk elsewhere through the introduction of impermeable surfaces that will increase the rate and volume of surface water produced on site. The site is in flood zone 1 and the risk of surface water flooding is relatively low. The scoping report states that a Flood Risk Assessment and Drainage Strategy will be included in the Environmental Impact Assessment. These should be completed in line with the Environment Agency's guidance (<https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>) and with reference to the CIRIA SuDS Manual C753, the Non-statutory technical standards for sustainable drainage and the latest Environment Agency guidance on climate change.

Archaeology (Gloucestershire County Council) has provided comments below.

The Gloucestershire Historic Environment Record shows blocks of medieval ridge and furrow cultivation, visible as earthworks on historic aerial photographs across parts of the proposed development site. Several Desk Based Assessments carried out have highlighted the high potential for prehistoric, Roman and Medieval remains to be present within the site. Some nearby discoveries include a Roman camp approximately 150m to the northwest of the site, a recent Roman villa and associated settlement recorded approximately 250m to the east of the site, significant Palaeolithic faunal and possible Neolithic settlement remains just south of the site. Draycott Mills has origins in the late medieval period and the Roman road from Gloucester to Sea Mills runs along the line of the A38 just west of the site.

It is good to see the scoping report includes a Cultural Heritage chapter with a Historic Environment Desk Based Assessment forming the baseline. However due to the high potential for significant heritage assets with archaeological interest to be present within the site I recommend that the results of geophysical survey and trial trench evaluation need to be included in order to provide a comprehensive assessment of the potential effects on cultural heritage remains. I also support Historic England's recommendation for an assessment of longer distant views to designated heritage assets, in particular from the three prominent scheduled monuments which lie just over 4km southeast of the site:-

- Uley Bury Camp (National Heritage List for England ref. 1004866)
- West Hill Romano-Celtic temple (NHLE ref. 1002076)
- Nympsfield long barrow 500m south of Hill Farm Cottage (NHLE ref. 1007912)

I recommend that the archaeological contractor for the developer should agree project specifications with the County Council's Archaeology Service for the programme of archeological evaluation.

Gloucestershire Wildlife Trust (GWT) has been consulted, however, comments have not been received.

The applicant may wish to discuss the merits of the proposal in terms of the likely impact on biodiversity directly with the GWT.

Planning Strategy (SDC) has made the following comments in relation to planning policy:

The site is identified as Draft site allocation PS24 West of Draycott in the Stroud District Local Plan Review: Draft Plan for Consultation November 2019 for strategic mixed use development including up to 700 dwellings, primary school, strategic landscaping, green infrastructure and associated community and open space uses to meet strategic growth needs for the period to 2040. The Sustainability Appraisal (SA) for the Draft Plan provides a strategic environmental assessment of PS24 West of Draycott (see Chapter 5).

The site adjoins adopted Local Plan settlement development limits for Cam, a Tier 1 settlement, which together with Dursley, provides an important second focus for the District, as set out in the updated Settlement Role and Function Study May 2019. The environmental statement should refer to adopted Local Plan policies for strategic new development, together with policies in the Cam Neighbourhood Development Plan (as modified by the Examiner's Report recommendations) with particular regard to the following key issues:

Whilst the site lies outside any protected landscape designation its sensitivity lies in its visibility in key views from the Cotswolds AONB to the south particularly on the higher parts of the site adjacent to Jubilee Fields designated Protected Open Space. Adopted Local Plan policies ES7, ES8, ES12 and ES13 apply. The new Stroud District Open Space, Green Infrastructure, Sport and Recreation Study June 2019 will also be relevant to inform any assessment of strategic landscape provision, integration with existing open space and green infrastructure provision including public footpaths and the role of Jubilee Field as a potential sport, health and well-being hub as identified in the Playing Pitch Strategy.

The site lies within the adopted Local Plan Severn Estuary SAC/SPA linear buffer where further assessment of the impact of recreational pressure and potential mitigation is required in accordance with Delivery Policy ES6 and the adopted mitigation strategy. The Habitats Regulation Assessment (HRA) for

the Draft Plan stage will also be relevant to understand the recreational pressure anticipated from strategic development of the site.

The Council is currently undertaking traffic modelling of the draft Local Plan sites, including this site, and the unmitigated growth scenario is being run to see the impact of development on the highway network with results to be published later in the summer. Officers will then work on what sustainable transport and highway junction improvements are possible before running these through the model to understand whether the draft sites are deliverable and the scope and nature of transport improvements required. The outputs of this work will need to be incorporated into any environmental statement. The impact on the Local Traffic network, in particular on the A4135 and its junction with Box Road will need to be assessed together with the impact on the wider strategic transport network at Junctions 13 and 14 of the M5. Assessment will also need to refer to the Sustainable Transport Strategy which seeks to secure a modal shift away from the private car alongside reference to the emerging Local Transport Plan recommendations. In particular the relationship of the site to the Cam - Dursley - Uley Greenway, with key linkages to the station as a potential public transport hub and the centre of Cam, to reduce car trips and achieve modal shift needs to be assessed. Please find a link [Here](#) to Stagecoach's response to consultation on the Draft Plan regarding the potential for PS24 to deliver a step change in public transport provision along the A38 strategic transport corridor.

The site is in close proximity and bounded to the north and north-west by the main Bristol to Birmingham railway line and the M5 motorway. Air quality, noise and vibration and potential mitigation will therefore need to be assessed. Reference should also be made to sustainable construction and design principles, in accordance with adopted Local Plan policy for new development, adopted supplementary planning guidance and the Local Plan Review policy drive towards zero carbon.

On foul and water drainage this will need to be investigated in terms of capacity of system and treatment. Please see link [Here](#) to Severn Trent's response to consultation on the Draft Plan. ARUP are currently working on the Infrastructure Delivery Plan to accompany the Local Plan Review with initial findings likely to be available over the summer.

On flood risk matters, reference should be made to SFRA 1 & 2 work accompanying the Local Plan Review.

Senior Contaminated Land Officer (SDC) has reviewed the scoping report and is satisfied with the proposals for land contamination and ground conditions chapter.

Specialist Conservation Officer (SDC) has provided the following comments.

Where Listed buildings or their settings, are affected by development proposals, Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act requires the decision-maker to have special regard to desirability of preserving the building or its setting or any features of special architectural or historic interest it possesses.

Historic England's Note 3 (the Setting of Heritage Assets) states that, 'settings of heritage assets which closely resemble the setting in which the asset was constructed are likely to contribute to significance.'

The NPPF defines the setting of a heritage asset as the surroundings in which it is experienced. The extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset; may affect the ability to appreciate that significance; or, may be neutral.

There are no historic assets within the site but there are some listed buildings within 1 km including the Goods Shed at Coaley Junction, Woodend Green Farm and Gossington Hall. An assessment of the impact on their setting should be carried out.

The proposal needs to be considered in line with the duties set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, policies set out in the NPPF and the Stroud District Local Plan 2015, and guidance from Making Changes to Heritage Assets'- Historic England Advice Note 2.

Water Resources Engineer (SDC) comments align the LLFA (GCC)

Environmental Protection Manager (SDC) has made the following comments in relation to potential environmental impacts:

- a) Noise, vibration, dust and local air quality impacts of site clearance and construction works;
- b) Potential noise, dust, odour, etc impact of surrounding land usages (predominantly agricultural, but also Millwood Motors site);
- c) Potential noise impact from road traffic (predominantly M5) and noise/vibration impact from railway; and,
- d) Potential air quality impact from road traffic (predominantly M5).

However, from the Environmental Protection perspective, these matters could readily be dealt with via the standard planning process.

Senior Arboriculture Officer (SDC) has reviewed the scoping report and the following information would need to be submitted:

- Landscape appraisal of the land.
- Landscape scheme including a five year management plan to aid establishment.

- Details of green infrastructure and how this will be implemented to improve connectivity across the development. This must include street trees.
- Hedgerow & ecological surveys.
- Arboriculture assessment of the development in line with BS5837:2012.

Biodiversity Team (SDC) confirm that the site falls within the Severn Estuary 7.7km identified catchment where it is considered new residential developments have the ability to negative contribute to increased recreation pressures on the Severn Estuary SPA. Therefore, the applicant has the option to either contribute to Stroud District Councils Avoidance Mitigation Strategy or provide their own mitigation strategy. After considering the submitted scoping report, I would recommend the following:

The site consists of arable cultivated land, improved grassland and poor semi improved grassland boarded by a network of hedgerows some of which are considered to be species rich and would qualify as important in accordance with the 1997 Hedgerows Regulations. There are also a number of waterbodies within and adjacent to the site and further to this Great crested newt (GCN) records.

The scoping assessment has suggested that further habitat and species surveys will be conducted for bats, dormice, GCN, hedgehogs and reptiles. This is agreed as a suitable approach, alternatively the applicant could consider NatureSpace's district licencing approach for the GCN.

I would also recommend that bat transect surveys are undertaken in order to understand how bats are using the site and to assess potential impacts the proposed development may have on local bat foraging and commuter routes.

Further to this I would recommend that farmland bird surveys are undertaken in order to fully assess the potential impacts on farmland priority species. The proposed change of use of the land will result in the total degradation of the habitat for farmland species therefore sufficient assessment of the site will be necessary.

The hedgerows are considered to be the most ecologically important features within the site and as such careful consideration should be given to the their retention and incorporation into the scheme.

Green infrastructure principles should be embedded into the design providing both habitat corridors and stepping stones for wildlife linking into the wider landscape corridors and aesthetically pleasing green space area for local residents.

Finally, the revised NPPF now requires developments to seek net gains in Biodiversity and as such measurable net gains must be demonstrated within the proposed plans, a metric such as Defra 2.0 or Warwickshire County Council's should be used to measure biodiversity losses and gains. If net gains cannot be achieved within the development site area offsite enhancements may need to be considered and discussed with the LPA.

Network Rail has concerns in relation to Slimbridge 46 footpath crossing (BGL 100m 73c) on the grounds of increased pedestrian usage.

Whilst the crossing is separated from the proposed development by the M5 motorway, the existing pedestrian subway underneath the motorway could provide increased usage on the crossing on which sighting is challenging. This route has been marked on the attached image.

An assessment of the impact the development would have on the nearby Slimbridge 46 level crossing should be included within any Transport Statement and / or Transport chapter of the submitted Environmental Statement. The assessment should include any suggested mitigation. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to also include any developer contributions to fund such improvements with an appropriate legal agreement linked any planning permission.

SAFETY

Any works on this land will need to be undertaken following engagement with Asset Protection to determine the interface with Network Rail assets, buried or otherwise and by entering into a Basis Asset Protection Agreement, if required, with a minimum of 3months notice before works start. Initially the outside party should contact: assetprotectionwestern@networkrail.co.uk.

Cam Parish Council, following a Planning Meeting, the Parish has set out their comments below:

The committee were all in agreement that the suggested 1,100 homes was out of line with previous SALA site plans contained within Stroud District Councils Emerging Local Plan which gave a figure of 700 homes. They felt strongly that the development should remain at 700 homes. There are multiple other sites surrounding this development which will significantly increase the numbers as a whole and have a dramatic impact on this particular area of Cam.

Cam's Neighbourhood Development Plan and Cam's Design Codes focus on creating quality developments which are in keeping with the character of the local area. Whilst we accept that the development will progress to a full planning application, the focus must be on quality not quantity. The strength of Cam's NDP will ensure this development, along with all the others, are of the highest quality and increasing the capacity to 1,100 will hinder this process.

The public consultation was based on the figure first quoted of 700 homes. Smaller additional sites surrounding this development will increase the number of homes in this area to around 1470. This will ultimately affect the overall quality of the development and decrease the amount of open green space. Building at a higher density at this site will further impact the open green space and recreational opportunities of the area.

The environmental impact of this proposal is also a concern for committee members. The area is well known to hold water and flood in many areas. The Jubilee Playing Fields which border this development are managed by the Parish Council who have experienced difficulties in coping with the flood water first hand. Building at an increased capacity will add additional risk by reducing the permeable surface area. There must also be recognition from the developers to include quality infrastructure as demanded by Cam Parish Council. Schools and shops should not be diminished to make way for an increased capacity of homes. The new road network contained within the development must be substantial to allow free flowing traffic, as well as parking and access to the Jubilee Field as previously requested. Planning and Highways Committee stress that the development of 700 homes will put additional pressure on the existing road network and junctions with the A4135 which will be under increased capacity from other developments in the area. Increasing to 1,100 homes will undoubtedly result in further pressure on these roads. In order for this development to be successful, the Parish need to see positive, beneficial and quality construction with due regard to local residents and existing infrastructure.

Slimbridge Parish Council, have noted the scoping report for this proposal and their main concerns are the additional traffic this will bring to a road that is already busy.

The main road from Cam has a turning on to Box Road where many developments are occurring, and where more traffic is accessing the train station, of which is already at capacity most days with cars parking along the road.

The A4135 is a busy road with limited or no pavement, yet it is publicised as access to the train station. Pedestrians and cyclists are at risk when using this road due to the volume of traffic and the speed of the road, this is not safe access to the station for cyclists and pedestrians, therefore more people use cars. The bridge over the railway is already dipping and it seems no action is being taken on fixing this.

With the potential development of Wisloe (PS37) being a strategic allocated site also, this development at Draycott will practically join Wisloe with the exception of the motorway acting as a boundary. This then raises concerns of noise and pollution for the site, along with coalescence of the parishes.

Overall further development in this vicinity will only have a detrimental effect to the locality by more traffic and pollution is therefore felt unsuitable for the area.

Summary of objections raised by the local community:

- Concerns with the amount of development in the open countryside over the years
- Priority should be given to brownfield land in Gloucestershire
- Existing infrastructure / services will be further stretched (includes doctors and dentists)
- Impact on Box road junction with the A38
- Primary school insufficient to offset over 1,000 new houses
- archaeological implications
- Concerns with drainage and flooding on existing housing
- Cumulative impacts of Wisloe, this proposed development and development adjacent to the railway station
- Development needed but this is the wrong location
- Increase in traffic accessing the train station, parking and overcrowding of trains
- Increase of traffic on air quality
- Loss of green open space
- The A4135 is a busy road with limited or no pavement, yet publicised as access to the station, not a safe route for cyclists and pedestrians
- Concerns of noise and pollution from the motorway
- Coalescence of Dursley and Slimbridge settlements
- Emerging Neighbourhood Plan is being ignored by developers
- Assessment of the effects of the pandemic on local housing needs should be undertaken

Council's Assessment

The Scoping Report has broadly addressed the main issues subject to concerns raised with (primarily relating to biodiversity and climate change) and additional points raised through the consultation process which would need to be addressed as part of the EIA process:

Inclusion of a Climate Change Chapter

Stroud District Council has declared a climate emergency and is committed to becoming carbon neutral by 2030. Due to the scale and likely impact of the proposed development, this proposal should have a dedicated chapter on how climate change will be managed. It is acknowledged that climate change is linked within with other chapters, however, a standalone chapter would better address climate change in context to other issues such as waste management, energy use and sources, sustainable transport,

sustainable use of materials and resources including water, the de-carbonisation of the development and the way in which it minimises the use of fossil fuels.

Therefore, climate change ought to have a major role as part of the EIA process and be scoped in.

Social-economics Chapter

It is noted that the Socio-economic Chapter considerations include the effects of the proposed development on: population; housing need; education provision; healthcare provision; emergency services; open space requirements; community facilities and the local economy. Based on the information submitted, the scope of the socio economic assessment is regarded as acceptable.

Landscape and Visual Chapter

The chapter includes determining the visibility of the proposed development and its effect upon receptors, which includes existing settlement, highways and public rights of way. The site lies outside any protected landscape designation its sensitivity lies in its visibility in key views from the Cotswolds AONB to the south particularly on the higher parts of the site adjacent to Jubilee Fields designated Protected Open Space. Therefore, the Adopted Local Plan policies ES7, ES8, ES12 and ES13 apply.

The new Stroud District Open Space, Green Infrastructure, Sport and Recreation Study June 2019 will also be relevant to inform any assessment of strategic landscape provision, integration with existing open space and green infrastructure provision including public footpaths and the role of Jubilee Field as a potential sport, health and well-being hub as identified in the Playing Pitch Strategy.

As noted by the Senior Arboriculture Officer (SDC), the following information would need to be submitted as part of the Environmental Statement:

- Landscape appraisal of the land.
- Landscape scheme including a five year management plan to aid establishment.
- Details of green infrastructure and how this will be implemented to improve connectivity across the development. This must include street trees.
- Hedgerow & ecological surveys.
- Arboriculture assessment of the development in line with BS5837:2012.

There is also a close link between biodiversity and landscape, therefore, see comments made in Ecology and Nature Conservation Chapter.

Ecology and Nature Conservation Chapter

Comments have been raised by Consultees (Biodiversity Team [SDC] and Natural England) relating to potential effects of the proposed development on biodiversity.

The biodiversity chapter should take into account:

The substantial uplift in the number of homes to be assessed (up from 700 to 1100). It is expected that this would exert significant negative pressure on the site's ability to accommodate suitable mitigation for key themes such as landscape and green infrastructure, for example due to increased housing density. This in turn risks impacts on the scheme's ability to deliver against the emerging plan's core policies.

Attention to the landscape related and ecological aspects of the scheme and the opportunity that preparation of the ES offers to incorporate suitable measures to mitigate adverse impacts and enhance the natural environment consistent with the net gain principles described in the revised NPPF. Of particular note are:

- Consideration of the type, scale and location of the application site in terms of the Cotswolds AONB (views from the scarp) and its setting.
- Potential impacts and positive opportunities associated with the application site's location between Woodchester Park SSSI and the Wye Valley & Forest of Dean Bat Sites SAC - two designated sites between which commuting by horseshoe bats has been recorded. Also the role that local rivers have for migratory fish designated as part of the Severn Estuary SAC and Ramsar site.

The site falls within the Severn Estuary 7.7km identified catchment where it is considered new residential developments have the ability to negatively contribute to increased recreation pressures on the Severn Estuary SPA. Therefore, the applicant has the option to either contribute to Stroud District Councils Avoidance Mitigation Strategy or provide their own mitigation strategy.

The site consists of arable cultivated land, improved grassland and poor semi improved grassland bordered by a network of hedgerows some of which are considered to be species rich and would qualify as important in accordance with the 1997 Hedgerows Regulations. There are also a number of waterbodies within and adjacent to the site and further to this Great crested newt (GCN) records.

The scoping assessment has suggested that further habitat and species surveys will be conducted for bats, dormice, GCN, hedgehogs and reptiles. This is agreed as a suitable approach, alternatively the applicant could consider NatureSpace's district licencing approach for the GCN.

It is recommended that bat transect surveys are undertaken in order to understand how bats are using the site and to assess potential impacts the proposed development may have on local bat foraging and commuter routes.

Furthermore, farmland bird surveys are undertaken in order to fully assess the potential impacts on farmland priority species. The proposed change of use of the land will result in the total degradation of the habitat for farmland species therefore sufficient assessment of the site will be necessary. The hedgerows are considered to be the most ecologically important features within the site and as such careful consideration should be given to their retention and incorporation into the scheme. Green infrastructure principles should be embedded into the design providing both habitat corridors and stepping stones for wildlife linking into the wider landscape corridors and aesthetically pleasing green space area for local residents.

The EA have requested that the EIA includes a water features survey and linkages are made between the Flood and Hydrology Chapter and the Ecology and Nature Conservation Chapter to ensure these features are protected and enhanced for biodiversity value.

Additionally, the EA have raised concerns between the draft Local Plan allocation of up to 700 dwellings and that this Scoping Request stated up to 1,000 dwellings. The increase in the scale of development could have a detrimental impact to the nature and quality of the Green Infrastructure provision (including optimum SuDS solutions). Therefore, the EA's concerns should be addressed through the EIA.

Furthermore, the EA supports the EIA addressing the likely effects after completion / during operation (Section 8.125), however, the assessment of impacts should also make reference to effects on morphology and hydrology as a result of significant increase in impermeable areas and change of land use.

The EA state that three areas that hold water (for at least part of the year) requires further investigation for the possibility of amphibian and other wetland wildlife.

Finally, the revised NPPF now requires developments to seek net gains in Biodiversity and as such measurable net gains must be demonstrated within the proposed plans, a metric such as Defra 2.0 or Warwickshire County Council's should be used to measure biodiversity losses and gains. If net gains cannot be achieved within the development site area offsite enhancements may need to be considered and discussed with the LPA.

Cultural Heritage Chapter

The Scoping Report includes a Cultural Heritage chapter with a Historic Environment Desk Based Assessment forming the baseline. However, due to the high potential for significant heritage assets with archaeological interest to be present within the site, it would be appropriate that the results of geophysical survey and trial trench evaluation need to be included in order to provide a comprehensive assessment of the potential effects on cultural heritage remains.

A 1km radius study area to identify potential receptors is not sufficient to identify highly-sensitive designated heritage assets that may become receptors and which are located in prominent positions in the landscape outside of the 1km study area.

Both the County Archaeologist and Historic England recommend for an assessment of longer distant views to designated heritage assets, in particular from the three prominent scheduled monuments which lie just over 4km southeast of the site:-

- Uley Bury Camp (National Heritage List for England ref. 1004866)
- West Hill Romano-Celtic temple (NHLE ref. 1002076)
- Nympsfield long barrow 500m south of Hill Farm Cottage (NHLE ref. 1007912)

It is also recommended that the archaeological contractor for the developer should agree project specifications with the County Council's Archaeology Service for the programme of archaeological evaluation.

This project thus has the potential to impact on the significance of sensitive, designated heritage assets via a change in setting. The National Planning Policy Framework (NPPF) refers to the conservation and enhancement of the historic environment in section 16. Paragraph 190 refers to the conservation of heritage assets and notes that effects can arise from both a physical change and a change in setting.

Finally, as noted by the Council's Specialist Conservation Officer, there are no historic assets within the site but there are some listed buildings within 1 km including the Goods Shed at Coaley Junction, Woodend Green Farm and Gossington Hall. An assessment of the impact on their setting should be carried out.

Transport and Access Chapter

The Scoping Report states that Transport and Access Chapter will be based on the analysis provided within the Transport Assessment (TA) and that this will be produced separately to the scoping and submitted to Highways Development Management (HDM) (Gloucestershire County Council).

As mentioned above (Consultations section), in the absence of HDM comments, the developer is advised to also contact consultee directly to seek their views in relation to the highway implications.

Notwithstanding this, the developer is made aware that the Council is currently undertaking traffic modelling of the draft Local Plan sites, including this site, and the unmitigated growth scenario is being run to see the impact of development on the highway network with results to be published later in the summer. Officers will then work on what sustainable transport and highway junction improvements are possible before running these through the model to understand whether the draft sites are deliverable and the scope and nature of transport improvements required.

The outputs of this work will need to be incorporated into any environmental statement. The impact on the Local Traffic network, in particular on the A4135 and its junction with Box Road will need to be assessed together with the impact on the wider strategic transport network at Junctions 13 and 14 of the M5. Assessment will also need to refer to the Sustainable Transport Strategy which seeks to secure a modal shift away from the private car alongside reference to the emerging Local Transport Plan recommendations. In particular, the relationship of the site to the Cam - Dursley - Uley Greenway, with key linkages to the station as a potential public transport hub and the centre of Cam, to reduce car trips and achieve modal shift needs to be assessed. Please find a link [Here](#) to Stagecoach's response to consultation on the Draft Plan regarding the potential for PS24 to deliver a step change in public transport provision along the A38 strategic transport corridor.

As directed by Highways England, the EIA process should have regard to Highway England policy requirements as set out in Circular 02/2013. Any application will need to be supported by a transport assessment which should consider the impact of the proposal on the operation of the SRN, including during the construction phase - in this case the M5 J13 to the north and J14 to the south - in line with the guidance contained within National Planning Practice Guidance and DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development. Any adverse impact will require appropriate mitigation to be provided in line with current guidance.

The adopted Stroud Local Plan is currently under review, with a Section 18 consultation having recently been undertaken. The infrastructure requirements for the emerging Local Plan are yet to be determined. The site is currently proposed as a draft strategic allocation (site PS24 - West of Draycott) comprising up to 700 dwellings, primary school, strategic landscaping and green infrastructure and associated community and open space uses. It is noted that the proposals outlined in the scoping opinion request differ to the draft allocation by increasing the housing numbers. We therefore consider this application to be premature in regard to ensuring that the infrastructure requirement for the site are integrated and coordinated with the overall transport strategy. This would require that the site's impact be considered cumulatively with the other development allocated in the emerging Local Plan.

If an application is to be submitted prior to the completion of the Local Plan review, the effects of the proposed development should be assessed cumulatively with other schemes and we would expect the applicant to agree an appropriate list of relevant other schemes, including committed development in the area, with the Council and Highways England.

As the site abuts the Highways England estate, Highways England will need to be consulted on any proposals which have a potential impact on the integrity of the infrastructure asset, including boundary treatment, noise fences, screening and other structures (E.g. bunds). As contained in Annex A, section A1 of DfT Circular 02/2013, these must be erected on the developer's land, and far enough within the developer's land to enable maintenance to take place without encroachment onto highway land.

The site layout masterplan should take account of the alignment of the existing motorway and hence not locate any residential properties in such a location that they would be impacted by noise generated from motorway traffic.

Air Quality Chapter

The Air Quality Chapter will set out the likely impact that the proposed development will have on local air quality as a result of any increase in emissions from road traffic and the impact of existing and future levels of air pollution on the proposed development.

As part of the methodology, specific comments made by the Council's Environmental Protection Manager should be incorporated within the EIA process:

- a) Noise, vibration, dust and local air quality impacts of site clearance and construction works;
- b) Potential noise, dust, odour, etc impact of surrounding land usages (predominantly agricultural);
- c) Potential noise impact from existing and proposed road traffic and railway; and
- d) Potential air quality impact from road traffic.

However, from the Environmental Protection perspective, these matters could readily be dealt with via the standard planning process.

Environmental Protection Manager (SDC) has made the following comments in relation to potential environmental impacts:

- a) Noise, vibration, dust and local air quality impacts of site clearance and construction works;
- b) Potential noise, dust, odour, etc impact of surrounding land usages (predominantly agricultural, but also Millwood Motors site);
- c) Potential noise impact from road traffic (predominantly M5) and noise/vibration impact from railway; and,
- d) Potential air quality impact from road traffic (predominantly M5).

However, from the Environmental Protection perspective, these matters could readily be dealt with via the standard planning process.

Noise and Vibration Chapter

See comments from Transport and Access Chapter, particular regard to the adverse changes to noise and air quality. Also see comments made on Air Quality Chapter, which incorporates comments from the Council's Environmental Protection Manager.

Hydrology, Flood Risk and Drainage Chapter

The Environment Agency (EA) states that the proposed development appears to be located entirely within Flood Zone 1. There are ordinary watercourses within the site and that the catchments are small to be included within the national flood map data set. However, as a precautionary measure, the developer is encouraged to work with SDC drainage and the Lead Local Flood Authority (LLFA) with modelling of these watercourses to ensure flood risk has been adequately addressed.

As stated by the LLFA, the development does have the potential to adversely impact flood risk elsewhere through the introduction of impermeable surfaces that will increase the rate and volume of surface water produced on site. The scoping report states that a Flood Risk Assessment and Drainage Strategy will be included in the Environmental Impact Assessment.

These should be completed in line with the Environment Agency's guidance (<https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>) and with reference to the CIRIA SuDS Manual C753, the Non-statutory technical standards for sustainable drainage and the latest Environment Agency guidance on climate change.

Ground Conditions Chapter

The Scoping Report has stated a desktop Phase 1 Preliminary Contamination and Geotechnical Risk Assessment. Following completion of the desk based assessment a site specific intrusive ground investigation will be carried out. The purpose of the ground investigation is to confirm the ground conditions and to target potential sources of contamination identified in the Phase 1.

The developer is advised to contact the Environment Agency (EA) to seek further guidance and information relating to the EA's Guiding principles for land contamination.

In-Combination and Cumulative Effects and Mitigation Chapter

This chapter considers the combined action of a number of different environmental topic-specific effects upon a single receptor or resource. It also considered that combined action of a number of projects, cumulatively with the project being assessed on a single receptor or resource.

Therefore, the chapter is regarded as acceptable.

Scoped out: Agriculture and Soil Resources Chapter

This chapter has been scoped out. However, impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraphs 170 (a) & (b) of the NPPF. It is felt more appropriate to include this under the Climate Change Chapter (see above) and to address sustainable use of land and the ecosystem services they provide as a natural resource in line with paragraphs 118 and 170 (d) of the NPPF.

Scoped out: Waste Chapter

This chapter has been scoped out. The nature and size of the proposed development would generate waste during the construction phase. The management of waste should be incorporated under the Climate Change Chapter (see above).

Scoped out: Utilities Chapter

This chapter has been scoped out. Utilities infrastructure should be incorporated under the Climate Change Chapter (see above).

Scoped out: Energy Chapter

This chapter has been scoped out. Energy management should be incorporated under the Climate Change Chapter (see above).

Scoped out: Health Chapter

This chapter has been scoped out. The Scoping Report states that relevant health considerations will be included within the Socio-economic Chapter.

Scoped out: Arboriculture Chapter

This chapter has been scoped out. The Scoping Report states arboriculture will be appropriately referenced within the Landscape and Visual Chapter and Ecology and Nature Conservation Chapter.

Conclusion

This Scoping Opinion has provided the Council's opinion in accordance with Part 4 section 10 of the Town and Country Planning Act.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Glebowit".

Proper Officer of the Council
Duly authorised in that behalf