



Public Document Pack STROUD DISTRICT COUNCIL

Council Offices • Ebley Mill • Ebley Wharf • Stroud • GL5 4UB
Telephone 01453 766321
www.stroud.gov.uk Email: democratic.services@stroud.gov.uk

13 March 2024

ENVIRONMENT COMMITTEE

A meeting of the Environment Committee will be held on **THURSDAY, 21 MARCH 2024** in the Council Chamber, Ebley Mill, Ebley Wharf, Stroud at **7.00 pm**

Kathy O'Leary
Chief Executive

Please Note: The meeting is being held in the Council Chamber at Stroud District Council and will be streamed live on the Council's [YouTube Channel](#). A recording of the meeting will be published onto the [Council's website](#). The whole of the meeting will be recorded except where there are confidential or exempt items, which may need to be considered in the absence of press and public.

If you wish to attend this meeting, please contact democratic.services@stroud.gov.uk.
This is to ensure adequate seating is available in the Council Chamber.

AGENDA

1. **APOLOGIES**
To receive apologies for absence.
2. **DECLARATION OF INTERESTS**
To receive declarations of interest.
3. **MINUTES (Pages 5 - 10)**
To approve the minutes of the meeting held on 7 December 2023.
4. **PUBLIC QUESTIONS**
The Chair of the Committee will answer questions from members of the public submitted in accordance with the Council's procedures.

DEADLINE FOR RECEIPT OF QUESTIONS Noon on Friday, 15 March 2024

Questions must be submitted to the Chief Executive, Democratic Services,
Ebley Mill, Ebley Wharf, Stroud and can be sent by email to
Democratic.services@stroud.gov.uk

5. **MEMBER QUESTIONS**
See Agenda Item 4 for deadlines for submission.
6. **BUDGET MONITORING REPORT Q3 2023/24 (Pages 11 - 20)**
To present the 2023/24 forecast outturn position against the revenue budgets and Capital Programme that the Committee is responsible for, in order to give an expectation of possible variances against budget
7. **2030 ANNUAL REPORT (Pages 21 - 54)**
To present the 2030 (Climate Change and Sustainability) Annual Report for 2023-24 for approval.
8. **GRASS CUTTING AND MEMORIAL PLAQUES (Pages 55 - 72)**
To seek approval for an alteration to the grass cutting regime in the district and to formalise a process for the installation of memorial plaques.
9. **SEVERN ESTUARY SPECIAL PROTECTION AREA (SPA), SPECIAL AREA OF CONSERVATION (SAC) & RAMSAR MITIGATION STRATEGY (Pages 73 - 126)**
To approve the Severn Estuary Recreation Mitigation Strategy for avoidance of likely significant adverse effects on Special Protection Area (SPA), Special Area of Conservation (SAC) & Ramsar.
10. **BRIMSCOMBE AND THRUPP NEIGHBOURHOOD DEVELOPMENT PLAN: PROGRESS TO REFERENDUM (Pages 127 - 152)**
To inform councillors of progress regarding the Brimscombe and Thrupp Neighbourhood Development Plan (BTNDP) and progress to referendum following the recommendations laid out in the Examiner's Report.
11. **SLIMBRIDGE NEIGHBOURHOOD DEVELOPMENT PLAN: PROGRESS TO REFERENDUM (Pages 153 - 184)**
To inform councillors of progress regarding the Slimbridge Neighbourhood Development Plan (SNDP) and progress to referendum following the recommendations laid out in the Examiner's Report.
12. **MEMBER / OFFICER REPORTS**
 - (a) **Strategic Planning Advisory Board (verbal update)**
 - (b) **Stroud Regeneration Committee (verbal update)**
 - (c) **Performance Monitoring (Pages 185 - 206)**
 - (d) **Climate Leadership Group (Pages 207 - 208)**
 - (e) **Retrofit support for self-undoing households Information Sheet (Pages 209 - 212)**
 - (f) **Cotswold National Landscape Board Net Zero Pathway - for SDC adoption Information Sheet (Pages 213 - 216)**
 - (g) **Lower Severn Internal Drainage Board (Pages 217 - 218)**
13. **WORK PROGRAMME (Pages 219 - 220)**
To consider the work programme.

Members of Environment Committee

Councillor Chloe Turner (Chair)

Councillor Martin Brown
Councillor Gordon Craig
Councillor Christopher Evans
Councillor Jessie Hoskin
Councillor Steve Hynd
Councillor George James

Councillor Robin Layfield (Vice-Chair)

Councillor Haydn Jones
Councillor Ashley Smith
Councillor Haydn Sutton
Councillor Brian Tipper
Councillor Tricia Watson

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ENVIRONMENT COMMITTEE

Thursday, 7 December 2023

7.00 - 9.16 pm

Council Chamber

Minutes

Membership

Councillor Chloe Turner (Chair)

Councillor Martin Brown
Councillor Gordon Craig
Councillor Christopher Evans

* Councillor Jessie Hoskin

Councillor Steve Hynd

* Councillor George James

* Absent

*** Councillor Robin Layfield (Vice-Chair)**

* Councillor Haydn Jones

Councillor Ashley Smith

* Councillor Haydn Sutton

Councillor Brian Tipper

Councillor Tricia Watson

Officers in Attendance

Strategic Director of Place
Managing Director, UBICO
Finance Director, Ubico
Senior Community Infrastructure Officer

Principal Planning Officer
Accountant
Democracy & Information Governance
Officer

EC.015 Apologies

The Chair, Councillor Turner welcomed Councillor Craig to his first Committee meeting.

Apologies for absence were received from Councillors Hoskin, James, Jones, Layfield and Sutton.

EC.016 Declaration of Interests

Councillors Craig and Tipper advised of interests under Agenda Item 10.

EC.017 Minutes

RESOLVED That the Minutes of the meeting held on 14 September 2023 were approved as a correct record.

EC.018 Public Questions

Public questions were submitted. They were answered by the Chair, Councillor Turner. Supplementary questions were also answered. (Refer to the recording of the meeting).

EC.019 **Member Questions**

There were none.

EC.020 **Ubico Annual Presentation (Verbal Update)**

The Managing Director of Ubico provided a verbal update to Committee on the Business Plan for 2024/2025 and explained the different pillars (People, Operational Excellence, Climate and Business Development) of the plan in addition to the sub pillars.

Councillor Tipper asked what checks were being undertaken to prevent identity theft of residents who do not remove their name or address from items presented for refuse and recycling. The Managing Director of Ubico advised staff were regularly trained on GDPR and sensitivity of data. The Finance Director of Ubico also confirmed impact assessments were undertaken regularly and Ubico had a dedicated Data Protection Officer.

Councillor Craig asked if Ubico adopted the 7-year renewal for the vehicle fleet. The Managing Director of Ubico confirmed however the vehicles were reviewed beforehand to see if they were still suitable past the 7-year recommendation.

Councillor Hynd asked what weight climate commitments and social value had within Ubico's procurement policy. The Finance Director of Ubico advised that the Business Plan was currently going through the engagement process however he was aware of the social value portal for tendering and would contact the Strategic Director of Resources in relation to Stroud District Councils (SDC) Procurement Policy.

EC.021 **Budget Monitoring Report Q2 2023/24**

The Accountant introduced the report and advised of a projected overspend of £178k. She advised that table 1 outlined the breakdown of Services within the Committee and there were not many significant changes to quarter 1 except the improved recycle costs, increased garden waste income and the overspend at Ubico linked to the salary uplift.

Councillor Craig asked if the increased costs on vehicle hire and repair was a result of Ubico wanting to purchase new vehicles and SDC were preventing it. The Chair, Councillor Turner advised the delay in replacing the vehicle fleet was due to waiting on the results from the Governments consultation relating to the future of recycling to ensure the correct vehicles could be procured. In response to a further question from Councillor Craig, the vehicle procurement had been budgetted for. The Accountant confirmed.

Proposed by Councillor Watson and seconded by Councillor Brown.

On being put to the vote, the Motion was carried unanimously.

RESOLVED To note the outturn forecast for the General Fund Revenue budget and the Capital Programme for this Committee.

EC.022 **ENVIRONMENT COMMITTEE REVENUE ESTIMATES – REVISED 2023/24 AND ORIGINAL 2024/25**

The Accountant introduced the report and highlighted the key points within the report. Table 1 outlined the base budget for 2023/2024 and the increased proposed budget for

2023/24

2024/2025. Table 2 provided narrative on the detail relating to where there were changes to budgets and included the carry forward virements from 2023/2024. Appendix B outlined the fees and charges growth which had been increased by the 5% inflation unless otherwise stated e.g. statutory fees.

Proposed by Councillor Hynd, seconded by Councillor Watson.

On being put to the vote, the Motion received 5 votes for and 3 abstentions.

RECOMMENDED TO STRATEGY & RESOURCES COMMITTEE

- a) **The revised Environment revenue budget for 2023/23 and original 2024/25 revenue budget are approved.**
- b) **The Fees and Charges list as shown at Appendix B is approved.**

EC.023 Cotswolds National Landscape Management Plan 2023 – 2025.

The Principal Planning Officer introduced the report advising the Plan enhanced and conserved the natural beauty of the Cotswold National Landscape (CNL). He continued and advised that the plan increased emphasis on the current climate and ecological crisis and could also be used as material consideration of any Planning Plans and Strategies including planning applications. Under 1.3 of the report, it outlined the reasons for the plan running for 2 years.

Councillor Smith referred to 2.5 of the report and asked the Principal Planning Officer what the implications would be to Stroud if the Cotswolds became a National Park given Stroud chose not to adopt the last CNL Plan. The Principal Planning Officer advised a key concern when Stroud responded to the Glover Review consultation was related to accountability and that the CNL Board were appointed not elected and secondly National Parks had their own planning powers.

Councillor Craig asked for clarification that the plan related to only the areas of Stroud included in the AONB. The Principal Planning Officer confirmed.

Proposed by Councillor Brown, seconded by Councillor Smith.

Councillor Brown summed up as proposer reiterating the key issues identified by the Principal Planning Officer and that the plan was compatible with SDC's Carbon Neutral ambitions. He advised that the CNL would be producing its own pathway to Net Zero to be adopted in February at the CNL Board which would require all partners to cooperate with.

On being put to the vote, the Motion was carried unanimously.

RESOLVED To note the content and aspirations of the Cotswolds National Landscape Management Plan 2023-2025 and recognise its importance in supporting and information the following:

- a) **Part of the evidence base for the Local Plan;**
- b) **Part of the evidence base for the preparation of Neighbourhood Development Plans;**
- c) **Part of the evidence base for the preparation and implementation of relevant Council strategies, policies and projects;**

- d) **The determination of planning applications (where compatible with relevant Local Plan and national policy) by acting as a material consideration; and**
- e) **The development and delivery of the Council’s services and activities.**

EC.024 COMMUNITY INFRASTRUCTURE LEVY (CIL) - SPENDING ALLOCATIONS FOR 2024/2025

The Senior Community Infrastructure Officer advised that the report listed the Officers recommendations for the Community Infrastructure Levy (CIL) funding spending for projects been April 2024 – March 2025. She continued and provided Committee with an overview of CIL including the legislative framework for the allocation of funding. She additionally also provided Committee with an overview of each of the projects that were being recommended for approval and refusal.

Councillor Brown asked if the CIL funding being allocated to Standish Path in addition to their other third-party funding revenues would complete the project. The Senior Community Infrastructure Officer advised the CIL funding would contribute to a specific phase of the large project connecting Standish Village to Stonehouse only, not the whole project to connect Stonehouse to Gloucester.

Proposed by Councillor Hynd seconded by Councillor Brown.

Councillor Brown advised he would like to see more shuttle bus options however acknowledged CIL funding would not be able to fund these types of projects due to not meeting the criteria.

On being put to the vote, the Motion was carried unanimously.

**RECOMMENDED That funding commitments are agreed according to the report.
TO STRATEGY
& RESOURCES
COMMITTEE**

EC.025 Open Spaces in New Residential Development

The Strategic Director of Place introduced the report and explained that the report followed the Motion taken to Full Council on 20 July 2023 to explore potential options. SDC and Parish/Town Councils could contribute to the management of open spaces and amenities associated with new housing developments. He drew Members attention to section 3, in particular 3.2 of the report which outlined the four key actions and confirmed that a further report would be brought to Committee in December 2024 with the findings of the action points.

Councillor Craig asked a question relating to the high level costing action point and whether it had been considered for developers to make an upfront cost contribution in advance. The Chair, Councillor Turner, advised that this suggestion was part of ongoing discussions relating to the arrangements of costings.

The Chair, Councillor Turner, gave thanks to Councillor Ryder whose Motion in July has resulted in positive cross party working group with officers.

Proposed by Councillor Brown seconded by Councillor Craig.

Councillor Hynd advised that residents within his ward had reported issues relating to Community open spaces not being maintained.

Councillor Brown summed up as proposer advising the four action points identified were taking positive steps following the Strategic Planning Advisory Board (SPAB) Meeting relating to the Motion.

On being put to the vote, the Motion was carried unanimously.

RESOLVED To endorse the actions proposed in section 3 of this report, concerning the management of open spaces and amenities in new residential developments.

EC.026 Appointments

a) Performance Monitoring Representative

Councillor Evans stood down from the role, Councillor Craig placed his name forward for nomination which was agreed. The Chair, Councillor Turner advised she would continue to support as the second representative.

b) Gloucestershire Resources Waste Partnership (GRWP) - Additional Representative

It was agreed that Councillor Watson would be SDC's second representative and Councillor Hynd would be substitute.

EC.027 Member / Officer Reports

a) Strategic Planning Advisory Board (SPAB) (Verbal Update)

The Chair, Councillor Turner, advised a special meeting to discuss the Open Spaces Motion had taken place as the regular meeting was cancelled due to the only item on the agenda being the Local Plan and no decisions were required to be made at that current time relating to it.

Councillor Craig expressed his concern and advised of the importance for SPAB to meet due to potential cost implications in defending non-appropriate planning applications if there were delays. The Chair, Councillor Turner, advised SPAB had discussions relating to the ramifications following receipt of the inspector's letter where SPAB agreed to respond to the letter. She advised SPAB's input would be crucial once a response is received back from the inspectors.

b) Stroud Regeneration Committee (Verbal Update)

There was no update as Councillor Layfield was not in attendance.

c) Performance Monitoring

There were no questions.

d) Climate Leadership Group (Verbal Update)

The Chair, Councillor Turner, advised an update was received on the energy theme from Forest of Dean District Council who were beginning development of a Local Area Energy Plan for the county. SDC provided an update on the Retrofit Work being undertaken at Stroud and finally, a new fund of £200k had been received from partners of the Climate Leadership Group which was going to fund a County risk and vulnerability assessment, a bid writer for County and a Green Skills Officer the County.

e) Stroud Canal Company (Verbal Update)

There was no update as Councillor Layfield was not in attendance.

f) UK100 Statement of Shared Intent

There were no questions.

EC.028 **Work Programme**

Councillor Brown requested the Adoption of the Cotswold National Landscape Board Net Zero Pathway be added for March.

RESOLVED To note the Work Programme.

The meeting closed at 9.16 pm

Chair

STROUD DISTRICT COUNCIL

ENVIRONMENT COMMITTEE

THURSDAY, 21 MARCH 2024

Report Title	Budget Monitoring Report Q3 2023/24			
Purpose of Report	To present the 2023/24 forecast outturn position against the revenue budgets and Capital Programme that the Committee is responsible for, in order to give an expectation of possible variances against budget.			
Decision(s)	The Committee RESOLVES to note the outturn forecast for the General Fund Revenue budget and the Capital Programme for this Committee.			
Consultation and Feedback	Budget holders have been consulted about the budget issues in their service areas. The feedback has been incorporated into to the report to explain difference between budgets and forecast income and expenditure.			
Report Author	Adele Rudkin, Accountant Tel: 01453 754109 Email: adele.rudkin@stroud.gov.uk			
Options	None			
Background Papers	None			
Appendices	Appendix A – Detailed breakdown of revenue position			
Implications (further details at the end of the report)	Financial	Legal	Equality	Environmental
	No	No	No	No

1. BACKGROUND

- 1.1 This report provides the third monitoring position statement for the financial year 2023/24. The purpose of this report is to notify members of any known significant variations to budgets for the current financial year, highlight any key issues and to inform members of any action to be taken if required.
- 1.2 **Due to the volume of information contained in the report, it would be helpful where members have questions on matters of detail if they could be referred to the report author or the appropriate service manager before the meeting.**

2. SUMMARY

- 2.1 The monitoring position for the committee as at 31 December 2023 shows a **projected net revenue overspend of £209k** against the latest budget, as summarised in Table 1.
- 2.2 The capital programme is showing a forecast spend of £3.439m against a revised budget of £6.812m. The variance of (£3.374m) relates to re-profiling of timings, predominantly on the Canal project, EV charging points and Stroud and District Walking and Cycling Plan.

2.3 Table 2 shows the capital spend and projected outturn for the Environment Committee for 2023/24.

3. REVENUE BUDGET POSITION

3.1 Council approved the General Fund Revenue budget for 2023/24 in February 2023 including budget proposals of the administration.

3.2 The latest budget for Environment Committee (including carry forwards) is **£7.426m** (Original Budget was **£7.260m**). This considers any MTFP adjustments, carry forwards and re-profiling of corporate maintenance budgets, and the agreed pay award for 2023/24 (£1,925 or 3.88%).

3.3 The outturn position is mainly attributable to those items outlined in Table 1 with an explanation of the significant variances that have arisen (a significant variation is defined as being +/- £20,000 on each reporting line).

3.4 Appendix A provides a more detailed breakdown on the Committee’s budgets.

Table 1 – Environment Revenue budgets 2023/24

	Para Refs	2023/24 Original Budget (£'000)	2023/24 Revised Budget (£'000)	2023/24 Forecast Outturn (£'000)	2023/24 Reserve Transfers (£'000)	2023/24 Outturn Variance (£'000)
Maddie2003						
Canal	3.5	183	183	44	139	0
Carbon Management	3.6	265	265	276	(11)	0
Economic Development	3.7	196	197	394	(197)	0
Health & Wellbeing	3.8	923	926	957	20	52
Land Charges & Street Naming	3.9	(6)	27	39	15	28
Planning Strategy/Local Plan	3.10	468	644	712	8	76
Statutory Building Control	3.11	(132)	(130)	(17)	(108)	4
Waste & Recycling: Other		26	26	26	0	0
Waste and Recycling: MSC	3.12	5,338	5,338	5,340	48	50
Environment TOTAL		7,260	7,476	7,771	(86)	209

note: table may contain rounding differences

3.5 **Canal - (£139k) transfer to reserves**
(Chris Mitford-Slade, xtn 4284, chrisms@stroud.gov.uk)

Any variances to the budget are timing differences, which will be reviewed, and the existing budget re-profiled to reflect the timetable.

3.6 **Carbon Management – (£11k) reserve transfer**
(Brendan Cleere xtn 4229, Brendan.cleere@stroud.gov.uk)

This is predominately focused around the Innovate to Renovate scheme which includes activity at a county level to develop Retrofit Centre services for householders and, 2030 delivery and coordination for SDC. The funding from WECA providing the 50% (match to

SDC reserves contribution) to help administer and support the project work. All roles are fixed term in line with the Innovate to Renovate grant provision. A vacancy saving has also been forecasted regarding the Senior Climate Change officer role. This saving has been attributed to overall salary saving reported through to Strategy & Resources Committee.

- 3.7 **Economic Development – (£197k) reserve transfer**
 (Leonie Lockwood xtn 4153, Leonie.lockwood@stroud.gov.uk.
 (Amy Beckett xtn 4043, amy.beckett@stroud.gov.uk)

Levelling up £70k

Remaining reserve budget has been allocated to ‘LUF’ for further lift design work at Stroud station and other fees to support the regeneration project.

UK Shared Prosperity fund £127k

UKSPF funds are being utilised as grant money to support businesses and communities in the district to become more prosperous, support a wider audience and meet the needs of the district.

- 3.8 **Health & Wellbeing - £52k overspend
 £20k reserve transfer**
 (Sarah Clark, sarah.clark@stroud.gov.uk)

Part of the projected overspend reflects the animal welfare service’s role within a multi-agency investigation, where many dogs were seized needing veterinary care and subsequent kennelling fees. Some costs may be able to be recovered through prosecution. A small overspend on agency staff, covering in year vacancies within the team has also been reflected. Equipment budget is forecast to overspend, this is to ensure that workstations are DSE compliant after returning to the Office after the pandemic. A carry forward of £20k is proposed regarding external COMF funding from GCC where Stroud has been the lead in developing the Environmental Health Profession locally.

- 3.9 **Land Charges – £28k overspend, income shortfall
 £15k reserve transfer**
 (Neil Marriott xtn 4112, neil.marriott@stroud.gov.uk)

A forecast of £15k shortfall in income due to the current suppressed housing sales market. In addition there is small overspend on legal fees around the data verification process. The Local Land Charges service is currently migrating it’s Local Land Charges Register to a service hosted by HM Land Registry. To facilitate that process, Stroud District Council has received funding from HM Land Registry which will run into next financial year.

- 3.10 **Planning Strategy – £76k overspend**
 (Tom Ridley xtn 4047, tom.ridley@stroud.gov.uk)

The overspend on consultancy fees is due to the Local Plan delays at EiP and additional work being required. Members will be aware of a prolonged Local Plan examination, involving additional Inspectors’ costs and further transport work required to address concerns raised by the Inspectors, which will lead to expenditure over the agreed budget. Any overspend will be met through appropriate reserves. An additional budget allocation (£100k 2023-24 & £70k in 2024-25) has been incorporated to the base budget to support ongoing works on local plan as approved by Council in Feb 24.

3.11 Statutory Building Control – (£108k) Reserve transfer

(Paul Bowley xtn 4520, paul.bowley@stroud.gov.uk)

A salary saving of (£34k) is forecast on a business support post which was removed as part of the budget setting process for 2024/25. Income after month 9 is £123k below budget, if this trend continues the income is forecast to be £150k below budget, December was a particularly poor month for income with £15k against a budgeted £52k. In year expenditure savings of £44k are predicted, despite this a shortfall of £150k is predicted. The reserve at the start of the year was in deficit by £14k, this deficit will increase, predicted to be 164k at year end. Timesheet work has been completed, the shared service board has agreed to a revised % split across all budgets in 2024/25 and a revised 5 year financial plan.

**3.12 Waste & Re-cycling-Multi Service Contract –
£50k overspend/over/under achieved income
£48k reserve transfer**

(Angela Gillingham xtn 4452, angela.gillingham@stroud.gov.uk)

A salary saving (£48k) is predicted regarding a new Waste Education Officer post. This vacancy has now recruited to and the in-year saving attributed to overall salary saving reported through to Strategy & Resources Committee

Recycling markets haven't shown too much movement in 2023 and given that markets are depressed, this has had a negative impact on the expected revenue from the sale of recyclates. Prices for paper and cardboard have been impacted the most and revenue is now expected to fall £131k short of budget. The Garden Waste scheme continues to grow, with over 16,000 current subscribers. The year-on-year growth means that revenue is exceeding budgetary expectations by (£165k).

The quarter three Ubico report is forecasting a £104k overspend against the original contract. The most significant variance £126k is related to the 23/24 Pay award. An overspend on vehicle hire £147k and vehicle repairs £30k is also predicted due to an ageing fleet that has been impacted by the global delays on procurement of new vehicles and the long awaited announcement of the Government white paper on recycling fleets. A saving of (£107k) on diesel has been forecast, due to the national reduction in diesel prices (budget £1.55 per litre, current £1.25 per litre). The change from diesel to HVO is now expected to commence early in the New Financial year. The introductory and ongoing costs for the implementation of the new 'in cab' system, are included in the forecast and in line with those outlined in the original business plan. Diesel and garden waste administration costs have reduced as a direct result in this financial year, with further annual savings to be realised in relation to weighbridge operations in 2024/25. We continue to work closely with the partnership and monitor forecasts on a monthly basis.

4. CAPITAL PROGRAMME

Table 3 below shows the Capital Outturn forecast for 2023/24 with a projected outturn variance of (£3.374m).

Table 2 – Environment Committee Capital Programme

	Para Refs	2023/24 Original Budget (£'000)	2023/24 Revised Budget (£'000)	2023/24 Forecast Outturn (£'000)	2023/24 Outturn Variance (£'000)
Environment Capital Schemes					
Canal		4,030	4,656	1,730	(2,926)
Community Infrastructure Levy Grants		195	195	195	0
EV Charge Points		0	196	0	(196)
Multi-Service Contract Vehicles		3,620	1,072	1,072	0
Rural SuDS Project		30	102	132	30
Stroud District Walking & Cycling Plan		515	362	143	(219)
UK Shared Prosperity Fund		0	165	165	0
Wallbridge-Gateway		38	65	2	(63)
Environment Capital Schemes TOTAL		8,428	6,812	3,439	(3,374)

4.1 Canal

Delays in obtaining planning permission have impacted the capital expenditure time-line pushing it into future years. The digging out of the missing mile is planned for 2025. Any variances to the budget are timing differences, which will be reviewed, and the existing budget re-profiled to reflect the timetable.

4.2 CIL

Community Infrastructure Levy (CIL) is collected from eligible developments, to be allocated on infrastructure projects by Environment Committee. Part of the CIL funding is transferred to the relevant town or parish council. This spend has not been budgeted, but is fully funded from the CIL receipts and so does not impact on the financial position of the council.

4.3 EV Charging Points

Stroud District Council received confirmation from OZEV in early February that the 50% project grant application had been successful. This allows us to move to the implementation phase. Full delivery is now expected early in the 2024/25 financial year.

4.4 Multi- Service Contract – Vehicles

Two delays in particular have contributed to the forecast underspend in 23/24. Firstly and most significantly the long awaited government response on Consistent Recycling, now Simpler Recycling, didn't arrive until late October 2023. This impacted decisions on fleet replacement being made. Furthermore, there has been some work undertaken to review the food waste fleet and ensure vehicles best suit the needs of the district. Both complications are now resolved, but whilst procurement procedures have commenced, no deliveries related to these vehicles will take place in 23/24 and capital spend is proposed to be re-profiled to 2024/25.

4.5 Rural SuDS

The third quarter is peak site work season for natural flood management and works were completed on two sites. Firstly, in Kingscote Woods in Horsley our work restored the stream back to its original position on the floodplain to allow water to spread across the area creating wetland or wet woodland. We implemented what is known as a stage "0" approach. This is where we fill in the existing artificial channel or bypass the existing channel and allow the water to find its own way across the floodplain. The project benefits include;

- The creation of a large and locally significant area of wetland /wet woodland resulting from the spreading of both low and high flows across the floodplain.

- Significant benefits for downstream communities as the existing straight ditches convey high flows at significant speed and volume through the woodland, increasing flood risk for the town of Nailsworth. Allowing High flows to spread across the floodplain will slow flows and reduce peak flows through the woodland and into the valley.
- Increased aquifer recharge -This will occur in periods of high flows as we expect significant infiltration through the floodplain into the aquifer under high flow conditions.

In summary, we created 2.7Ha of new wet woodland/floodplain wetland habitat in two distinct areas, improved approx. 800m of stream habitat and added over 100 LWD structures. The second work site was a phase 2 of works at Hammonds Farm in the Painswick Valley. Here, we have created a series of large interventions on the floodplain of the lower Painswick Stream using Ash and Alder trees. Approx 25 tree trunks have been kept whole and laid at right angles to the flow of the stream to attenuate flood waters on the floodplain and allow sediment and silt to drop out of the reduced flows created by the trees.

The £30k forecast variance will be funded from GCC

Finally, we have agreed to hold an event during Stroud Film Festival to showcase the art, poetry and films we have commissioned. The event will be held on March 9th at the Museum in the Park.

4.6 **Stroud District Cycling and Walking Plan**

Following completion of the detailed design of Standish Greenway, a further award of £57k has been awarded to compliment a successful CIL bid of £400k to construct this section of the greenway.

£16.4 has been awarded towards the walking and cycling elements of the broader Berkley Town Centre Improvement project which has also been awarded further CIL investment. Local projects to improve access to walking and cycling in Cam, Woodchester and Horsley have been completed. Any projected underspend in this financial will be proposed to be re-profiled in 2024/25.

4.7 **UK Shared Prosperity Fund**

UKSPF funds are being utilised as grant money to support businesses and communities in the district to become more prosperous, support a wider audience and meet the needs of the district.

4.8 **Wallbridge Gateway**

This is the remaining budget that was originally allocated for the public realm improvements at Wallbridge. This budget was included as part of the Council's match funding for the LUF round 2 bid. Details of round 3 for LUF are still awaited and this budget will be required if we have the opportunity to bid for these improvements again as part of the bid or to look to progress some improvements in the absence of a LUF.

5. **IMPLICATIONS**

5.1 **Financial Implications**

There are no financial implications arising from this report as it reports on previous financial activities, and expected forecasts.

Lucy Clothier, Accountancy Manager

Tel: 01453 754343 Email: lucy.clothier@stroud.gov.uk

5.2 Legal Implications

There are no legal implications arising from this report.

One Legal

Tel: 01684 272012 Email: legalservices@onelegal.org.uk

5.3 Equality Implications

There are not any specific changes to service delivery proposed within this decision.

5.4 Environmental Implications

There are no significant implications within this category.

	Para Refs	2023/24 Original Budget (£'000)	2023/24 Revised Budget (£'000)	2023/24 Forecast Outturn (£'000)	2023/24 Reserve Transfers (£'000)	2023/24 Outturn Variance (£'000)
Environment Committee						
Canal Restoration Project		183	183	44	139	0
Canal		183	183	44	139	0
Energy Efficiency		265	265	276	(11)	0
Carbon Management		265	265	276	(11)	0
Economic Development		156	155	225	(70)	0
Regeneration		40	41	41	0	0
UK Shared Prosperity Fund		0	0	127	(127)	0
Economic Development		196	197	394	(197)	0
Contaminated Land		21	21	21	0	0
Dog Warden Service		112	113	137	0	24
Environmental Protection		201	200	218	0	18
Food Safety		176	176	147	20	(9)
Head of Health and Wellbeing		83	82	82	0	0
Health & Wellbeing		108	110	125	0	15
Health and Safety		95	95	90	0	(5)
Land Drainage		58	58	61	0	3
Pest Control		9	10	18	0	8
Planning Liaison		17	16	16	0	(1)
Port Health		(2)	(2)	(3)	0	(1)
Public Health		45	45	45	0	(0)
Health & Wellbeing		923	926	957	20	52
Land & Property Custodian		24	57	59	15	18
Street Naming		(30)	(30)	(20)	0	10
Land Charges & Street Naming		(6)	27	39	15	28
Nature Recovery & Biodiversity		64	74	74	0	0
Planning Strategy		403	571	638	8	76
Planning Strategy/Local Plan		468	644	712	8	76
Building Control		(173)	(171)	(63)	(108)	0
Building Regulation Enforcement / Advice		31	31	35	0	3
Securing Dangerous Structures		10	10	11	0	1
Statutory Building Control		(132)	(130)	(17)	(108)	4
Waste & Recycling: Other		26	26	26	0	0
Waste & Recycling: Other		26	26	26	0	0
MSC: Bulky Waste		23	23	14	0	(9)
MSC: Food Waste		1,023	1,023	1,000	0	(23)
MSC: Garden Waste		(23)	(23)	(242)	0	(219)
MSC: Recycling		1,621	1,622	1,874	48	301
MSC: Refuse Collection		1,817	1,817	1,816	0	(1)
MSC: Street Cleansing		877	877	877	0	0
Waste and Recycling: MSC		5,338	5,338	5,340	48	50
Environment TOTAL		7,260	7,476	7,771	(86)	209

Note: table may contain rounding differences

	Para Refs	2023/24 Original Budget (£'000)	2023/24 Revised Budget (£'000)	2023/24 Forecast Outturn (£'000)	2023/24 Reserve Transfers (£'000)	2023/24 Outturn Variance (£'000)
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STROUD DISTRICT COUNCIL
ENVIRONMENT COMMITTEE
THURSDAY, 21 MARCH 2024

Report Title	2030 Annual Report			
Purpose of Report	To present the 2030 (Climate Change and Sustainability) Annual Report for 2023-24 for approval.			
Decision(s)	The Committee RESOLVES to approve the 2030 (Climate Change and Sustainability) Annual Report for 2023-24 for publication.			
Consultation and Feedback	The draft report has had the input of managers and core delivery staff across SDC. This report is a reflective document to celebrate the progress on the 2030 strategy, and some community voices are represented through the various case studies. If approved, this report will be published through SDC website and press release. No prior formal consultation has been deemed necessary.			
Report Author	Jenny Youngs, Environment Performance Officer Email: jenny.youngs@stroud.gov.uk Georgia Spooner, 2030 Community Action Officer Email: georgia.spooner@stroud.gov.uk			
Options	This report of annual progress is focused on 12 months, dated March 2023 – February 2024, of the 2030 masterplan. It reviews progress on the key priorities and commitments and a forward look describes key areas for next steps in our roles as exemplar, enabler and encourager. The committee's options are: to approve the report; to ask officers to consider amendments or, to reject the report.			
Background Papers	None			
Appendices	Appendix A – 2030 Strategy Annual Report 2023			
Implications (further details at the end of the report)	Financial	Legal	Equality	Environmental
	No	No	No	No

1. Introduction / Background

- 1.1 The formal adoption of the 2030 Strategy and Masterplan in February 2021 followed on from the climate emergency declaration in 2018. 7 key priorities were identified and commitments were made against those priorities, which we now report against annually. This report does not replace performance indicators, but rather acts as a summary of work in the district that falls within those 7 priorities, as well as providing forward plans for 2024.

2. Main Points

- 2.1 This report is not overly statistical as we have embedded KPI's through the Council Plan which will be publicly reported. There is great progress across all 7 themes of the strategy, with just some of these actions highlighted in the below table.

Theme	Highlight
Built Environment	<p>Exemplar: £1.7m government grant funding for retrofitting 250 SDC homes to EPC C minimum.</p> <p>Enabler: Action research project ‘Low Carbon Communities’ funded by UKSPF and MCSCF to support up to 75 private homeowners in the district with a retrofit assessment from Severn Wye Energy Agency and opportunities to mix and support each other through retrofit decisions.</p> <p>Encourager: Development Management approving planning permission of nearly 100,000 solar PV and attending Wotton Area Climate Action Network’s meeting to discuss solar panels.</p>
Energy	<p>Exemplar: Work has begun on The Pulse, Stratford Park LC and Museum in the Park to replace ageing boilers with air source heat pumps. Scope 1 emissions are down by 21% compared to 2022.</p> <p>Enabler: Southwest Net Zero Hub’s funding opportunity has been shared with community networks including the new community energy group ‘Stroud Area Community Energy Group’ (SACEN)</p> <p>Encourager: SDC continues to signpost people via our website, social media and ‘The Retrofit Centre’ website to ‘Warm and Well’, with HUG2 scheme providing funding for energy efficiency and renewable heating in the most vulnerable of households in the district.</p>
Natural Environment	<p>Exemplar: Leading on the production of Biodiversity Net Gain guidance for developers and planners throughout Gloucestershire.</p> <p>Enabler: 187 new Natural Flood Management interventions and 2.8 hectares of new wetland created</p> <p>Encourager: SDC hosted the first meeting of a Stroud Farmer group, to help farmers support each other and provide some guidance on the various agri-environment schemes available and the funding options associated with such schemes</p>
Mobility	<p>Exemplar: Facebook and Instagram posts about the Natural Flood Management officer Chris Uttley covering nearly 1,000 work miles on his electric work bike.</p> <p>Enabler: Work begun on introducing EV charge points at all but one of Stroud District Councils public car parks.</p> <p>Encourager: Limiting the renewal of taxi licences for vehicles over 10 years old, with a move towards Euro 6 compliance, and a whole range of social media posts to promote Cycle September</p>
Economy	<p>Exemplar: As part of the transition of Stratford Park Leisure Centre into a core council service, we will be fully appraising our catering options with sustainability and reduced food miles at the heart of our decision making.</p>

	<p>Enabler: In partnership with Climate Leadership Gloucestershire’s partners, we have funding secured for a county-wide green skills coordinator to help meet the growing demands for future skills.</p> <p>Encourager: Launch of <i>Stroud District: The Natural place</i>, a prospectus aimed at attracting more investment, focusing on environmental technologies, engineering and manufacturing and creative industries.</p>
Waste and resources	<p>Exemplar: In-cab system introduced into waste vehicles to digitalise workflow and reduce mileage. Waste fleet replacement strategy devised to replaced ageing vehicles with Hydrotreated Vegetable Oil (HVO).</p> <p>Enabler: Promoting behaviour change through celebration of good recycling rates, with over 2,500 likes or comments of a range of posts.</p> <p>Encourager: Messaging through SDC social media re World Refill Day, plus promotion of local guided DIY bike repair opportunities.</p>
Community	<p>Exemplar: Opportunities for staff to increase their own active travel for work were offered through free bike maintenance sessions and bike bell giveaway, and motivation by a staff blog written by a staff member giving up her car for September and contributed to by other staff members to build adoption of reducing use of private car.</p> <p>Enabler: Stroud District Youth Council have attended intergenerational events, been regularly represented at the 2030 Community Engagement Board, have supported outreach opportunities for local students to engage with climate action, and have developed on skills to communicate with people who have different world views such as climate change denial.</p> <p>Encourager: The 2030 Community Engagement Board has embedded itself over its second year through 8 meetings with 12 regular attendees building their understanding of behaviour change and climate action, and how best the 2030CEB can best be used to support local climate action projects through mentoring and connecting.</p>

- 2.2 The 2030 Strategy team itself has worked closely with colleagues across the council and under direct line management from the Director of Place. The 2030 Strategy Manager post has been vacant since June 2023. The Low Carbon Communities Project Manager has been on long term compassionate leave since June 2023 so the project management of this retrofit project has been shared in house by the remaining 2030 team, and with the contractors Severn Wye Energy Agency.
- 2.3 This year we have once again completed Climate Disclosure Project assessment giving external verification to our efforts this year to ‘B’ Grade.
- 2.4 The draft Local Plan remains at examination; therefore, some of the policy plans will not be adopted this calendar year.
- 2.5 The 2030 team continue to work as part of the Community Connections workstream of the Fit for the Future programme to support the development of these principles.

- 2.6 Direct carbon emissions from our own facilities and vehicles (Scope 1) and indirect emissions from assets we own but do not control (Scope 3) have decreased by over 20% each. Our indirect emissions from electricity we purchase (Scope 2) has marginally increased by 1%, reflective of slightly more usage from some SDC buildings. Data is compared to 2022. Overall, we estimate that SDC has reduced 329 tonnes of CO2 in 2023 compared to 2022.
- 2.7 SDC have continued as Retrofit theme lead for Climate Leadership Gloucestershire (CLG), a strategic group of public authorities in the county. We have continued to report on activities across the county on retrofit, presenting to the CLG recommendations for Local Authority endorsed retrofit support for households across the county. This is goes hand-in-hand with a recommendation in the CLG Economy theme for a Green Skills Co-ordinator to increase training provision with local providers to meet the need of future skills, particularly retrofitting skills.
- 2.8 Members are asked to note that minor editorial changes and additions to the Annual Report (Appendix A) will continue to be made prior to final publication.

3. Conclusion

- 3.1 Action on the 2030 Strategy and Masterplan has been broad across many areas of the council, from Tenant's Services to Development Management, through Waste Management and Community Services, and beyond. It's been a pleasure to collect all this good news from across the council's own operations, in its partnerships and with community voices. As we look ahead to 2024-25, the 2030 team are planning a series of projects designed to make climate and sustainability behaviour changes more accessible to people, aided particularly by the allocated budget for the year. Towards the end of the report, there is a forward look where we have highlighted just some of these projects which will be in addition to programming commitments made in the council plan.

4. Implications

4.1 Financial Implications

There are no direct financial implications arising from this recommendation.

Adele Rudkin Accountant

Tel: 01453 754109 Email: adele.rudkin@stroud.gov.uk

4.2 Legal Implications

There are no direct legal implications arising from the content of this report.

One Legal

Tel: 01684 272254 Email: legalservices@onelegal.org.uk

4.3 Equality Implications

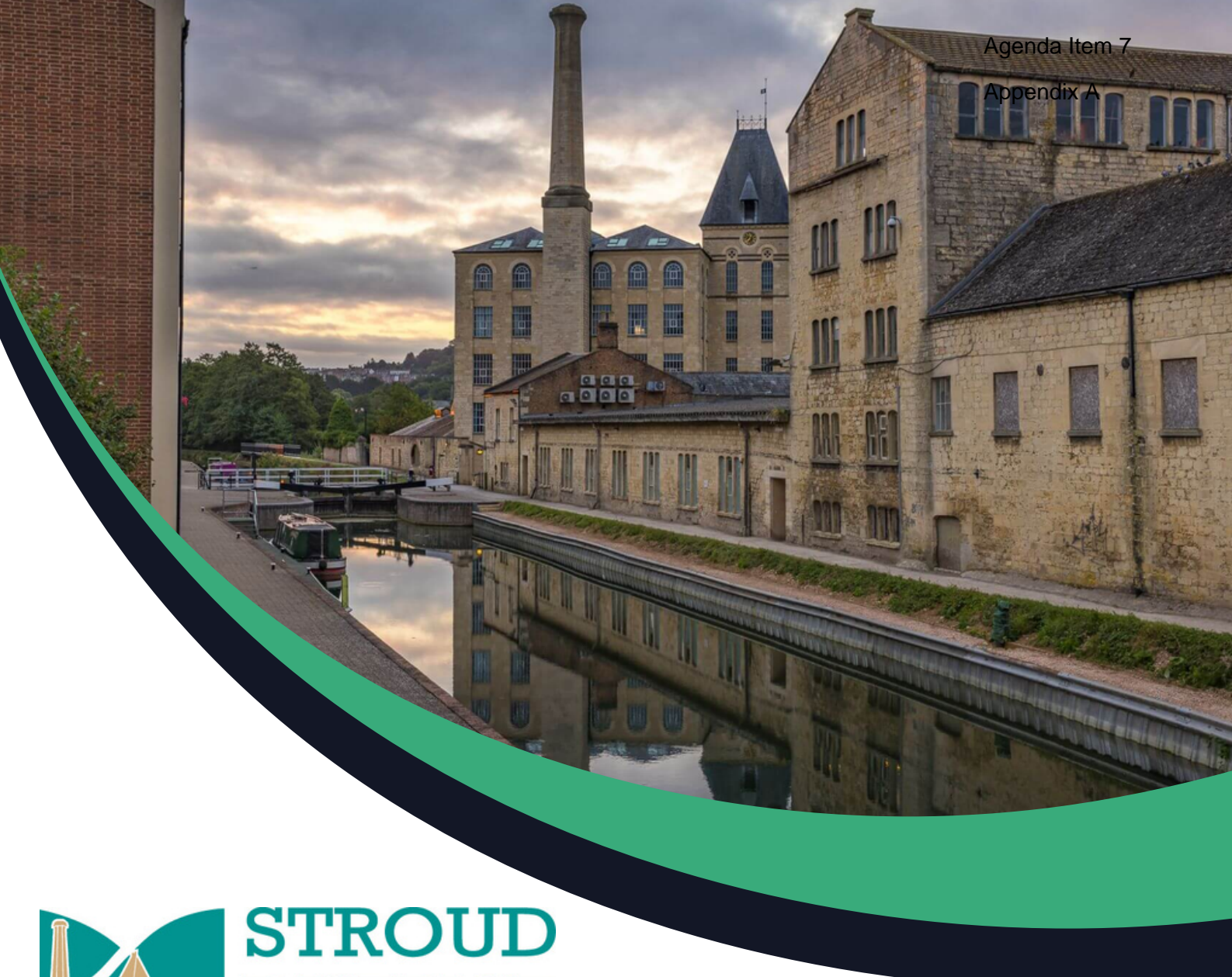
An EIA is not required because there are no recommended actions as a direct result of this report

4.4 Environmental Implications

There are no significant implications within this category. Actions and decisions arising from the implementation of the strategy may have environmental implications, which will need to be considered at the relevant time. Delivery of targets within strategy will make a

significant positive contribution to: reducing the impacts of the changing climate; recovering nature and, achieving carbon neutrality for the district. Delivering of the targets within the strategy will also make significant contribution to the whole district contribution to meeting the Paris Conference carbon emission reduction targets and National Government targets for net zero 2050.

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**STROUD
DISTRICT
COUNCIL**

2023-2024

ANNUAL

2030 REPORT

Progress Towards the Council's Climate
Change and Sustainability Goals.

CONTENTS

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FOREWORD

Cllr Chloe Turner

“Climate action has never been more crucial. In 2023, for the first time, we saw global warming exceed 1.5% degrees. This first year-long breach of the limit agreed by world leaders in Paris in 2015 – along with the unprecedented floods, heatwaves and wildfires we’re seeing all over the world – should be a wake-up call to us all. The 2030 Strategy for Stroud district was drafted in 2021 as our blueprint for how we can limit, adapt, recover and respond in a changing climate. In it, we pledged that we’d do everything within the Council’s power to make Stroud district carbon neutral by 2030.

As this latest report shows, many of the actions to reduce carbon bring additional benefits. For example, our programme of work to make our council homes lower carbon, which has been shortlisted for a national award, will also make them warmer, cheaper and healthier to live in for residents.

Our active travel work across the district, like the funding we have put towards the Transition Stroud e-bike hire scheme and the resurfacing work on the Stonehouse path, will allow more residents to leave the car behind, should they choose to, and enjoy the health benefits that come with travelling by bike.

Our ambitious project, boosted by a £4.7m government grant, to replace ageing gas boilers with brand new renewable heating systems at Stratford Park Leisure Centre, The Museum in the Park and The Pulse, will make those sites more sustainable in the long term and help ensure that our leisure services continue to be available to all.

Our outreach work with local farmers and landowners aims to support them at a challenging time, recognise their importance to our local economy and communities, and also highlight the key role they have in climate and nature solutions for our area.

Three years on from the publication of our 2030 Strategy, we thank everyone working with us to address the climate and nature emergencies, to protect our District’s character and communities today and for many generations to come.”



A YEAR IN NUMBERS

2

2030 COMPATIBLE
NEIGHBOURHOOD
DEVELOPMENT PLANS
PROGRESSED TO
EXAMINATION

3.54

KILOMETERS OF
STREAM RESTORED

SCORE: B

THE COUNCIL
ACHIEVED A "B" IN
2023'S CDP CITIES
ASSESSMENT

24

PUBLIC EV
CHARGE POINTS
APPROVED

99,465

SOLAR PANELS
APPROVED THROUGH
PLANNING PERMISSION

21%

REDUCTION IN SCOPE
1 EMISSIONS
COMPARED TO 2022

187

NEW NATURAL
FLOOD
MANAGEMENT
INTERVENTIONS

2.8

HECTARES OF
NEW WETLAND
CREATED

BUILT ENVIRONMENT

Enabling services that support homeowners to make homes warmer, greener and cheaper to run.

Buildings are the biggest source of greenhouse gas emissions after transport and Local Authorities are seen as trusted sources to support homeowners in their self-funded retrofit journey. Working with other city and district councils in the county, we are developing 'The Retrofit Centre' website as a first port of call for homeowners, and, through contracting Severn Wye Energy Agency, have delivered bespoke retrofit assessments and support to 75 properties in the district.

We are also maintaining the provision of specialist support services to vulnerable residents in the district through Warm and Well. 311 households supported April to Sept 2023, 552 enquiries to advice line, 91 home visits made, 29 home improvements supported with ECO4 and Green Homes Funding. Delivery of Home Upgrade Grant 2 Scheme commenced to provide funding for energy efficiency and renewable heating home improvements

More SDC owned council homes are improved to cut fuel bills and carbon emissions.

In March 2023, SDC were awarded a Government grant of £1.7 million to improve the energy efficiency of 250 council homes. This will include external and cavity wall insulation, loft insulation top up and ventilation, resulting in EPC C minimum and reduced heating bills for each property.

SDC has been shortlisted as a finalist for The Retrofit Academy “Best Social Housing Retrofit Programme Award”. The Academy has acknowledged the exemplary work and commitment SDC is undertaking in driving excellence in retrofitting our council homes. The winner will be announced in March 2024.



Collaborating with Town and Parish Councils

Collaborating to develop 2030 compatible neighbourhood development plans (NDPs). NDPs include a review of actions to date that address the Climate Emergency, and an exploration of practical projects that benefit the climate and environment.

E.g. Slimbridge Parish Council have described how they are seeking land to be used as allotments and an appropriate site for a community orchard. They are also looking at how to care for their hedgerows and verges to improve biodiversity.

Community Infrastructure Levy (CIL)

The CIL bid process has included a specific focus on meeting the objectives set in SDC's Climate Change 2030 Strategy since the 2021 funding round. Projects that help to reduce the community carbon footprint are recognised within the formal assessment process; those schemes that can be seen to be delivering the greatest sustainability goals have a higher chance of gaining CIL funding support.

Projects approved for CIL funding in 2024/25 include:

- Standish multi-user path to improve active travel accessibility
- Stroud Merrywalks Interchange Hub to encourage greater use of public transport
- Sustainable drainage for water quality and habitat at Stratford Park

ENERGY

SCOPE 1

Emissions down by 21% compared to 2022



SCOPE 2

Emissions up by 1% compared to 2022



SCOPE 3

Emissions down by 25% compared to 2022



SCOPES EXPLAINED

Agenda Item 7

Appendix A

SCOPE 1: DIRECT EMISSIONS FROM OUR OWN FACILITIES AND VEHICLES (IN-SITU COMBUSTION)

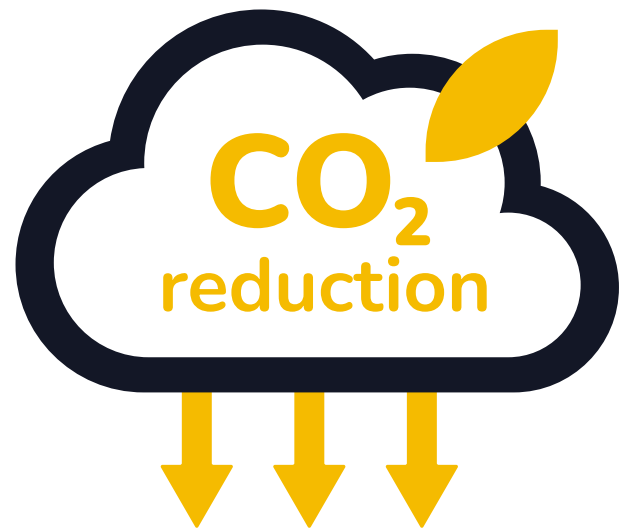
SCOPE 2: INDIRECT EMISSIONS FROM ELECTRICITY WE PURCHASE

SCOPE 3: INDIRECT EMISSIONS FROM ASSETS WE OWN BUT DO NOT CONTROL

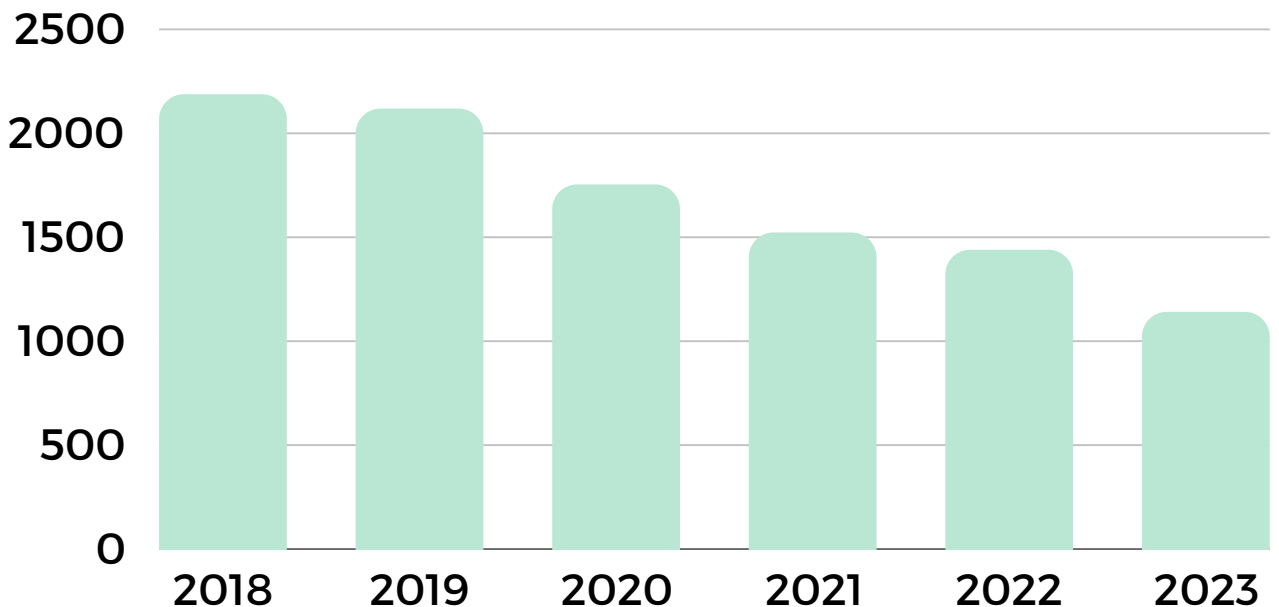
OVERALL CO₂ REDUCTION

2022 VS. 2023

299
Tonnes



■ Emissions CO₂e



We've Gone Green

Contractor appointed and work has started on The Pulse, Stratford Park Leisure Centre and the Museum in the Park to replace ageing boilers. Over the winter, Stratford Park Leisure Centre was partially closed to allow for the installation of a new renewable heating system

Explore renewable energy innovation

South West Net Zero Hub's funding opportunity has been shared with community networks including the new community energy group 'Stroud Area Community Energy Group' (SACEN)

NATURAL ENVIRONMENT

An officer action group for the Natural Environment meets every 4 weeks chaired by Strategic Lead for Nature Recovery and Biodiversity, sharing information and supporting each other.

Changing some grass cutting to a 'Meadow Mow'; one cut per year which encourages more diversity and healthier soils.

Where safe to do so, we have stopped mowing within a meter of Council-owned trees to allow for less soil compaction and healthier tree roots

Funding has been received from the Community Infrastructure Levy to clean up the Council-owned lake in Stratford Park, restoring it to better biodiversity



Appendix A

Leading on the production of guidance for developers and planners throughout Gloucestershire, providing groups with clear guidance and support with regard to any planning application requiring Biodiversity Net Gain as part of their application. In addition to this, SDC are working with Gloucestershire Nature and Climate Fund to ascertain the available and preferable locations upon which to develop BNG.

A severe, climate driven, flood event on 12th June measured at 220mm/hr in 30 minutes impacting 100+ properties including internal flooding at Stroud Hospital, 21 dwellings and numerous businesses. The district only saw the edge of storms Babet to Henk; SDC emergency response was active throughout and has been refined as a result

Epney and Longney Property Flood Resilience Scheme is progressing in partnership with the Environment Agency. SDC are working in partnership with Gloucestershire Rural Community Council to establish and maintain a network of flood wardens across the district.

CASE STUDY

Wetland and stream restoration works in Kingscote Woods, Horsley

Stroud District Council and Forestry England implemented one of the most ambitious stream restoration projects within the Stroud Valleys this October in Kingscote Woods. Kingscote Wood has been owned and managed by Forestry England since 2019 and the Forest Plan showing future management of the woods can be viewed at: www.forestryengland.uk/forest-planning/kingscote-forest-plan

Historic management of the stream within the lower part of the woods on the two large floodplains had resulted in the natural stream channel being straightened and en-ditched (made deeper) to reduce the amount of water that can leave the channel at high flows. This work was carried out to stop water from spreading across the floodplain and potentially impacting young Ash and Beech trees. In addition, the straight channel has also been moved over to one side of the floodplain to a point where it is unnaturally higher than the valley floor. This meant that lower flows were lost through the permeable bed of the artificial channel, resulting in significant impacts to the stream in both low and high flows.

Whilst this original work was done with the best of intentions, the ecological impacts were significant, resulting in the loss of wetland and stream habitats, an increase in flood risk downstream and longer periods of time when there is little or zero flow in the stream.



New areas of wetland created

In October 2023, we undertook work to restore the stream back to its original position on the floodplain and allow the water to spread across the area creating wetland or wet woodland. The benefits of the work include:

- a. The creation of a large and locally significant area of wet woodland resulting from the spreading of both low and high flows across the floodplain. This habitat type is nationally rare and will boost the biodiversity of the woods and help store more carbon.
- b. Significant benefits for downstream communities as the existing straight ditches convey high flows at significant speed and volume through the woodland, increasing flood risk for the town of Nailsworth. Allowing High flows to spread across the floodplain will slow flows and reduce peak flows through the woodland and into the valley. This will also improve water quality as the flows percolate through the vegetation.
- c. Increased aquifer recharge - This would occur in periods of high flows as we expect significant infiltration through the floodplain into the aquifer under high flow conditions.

CANAL RESTORATION



The Heritage Lottery funded project, Cotswold Canals Connected, has delivered multiple environmental, social, economic and health benefits through this reporting period, including:

- Upskilling volunteers in using brush cutters and scythes, assessing the biodiversity of a river through Riverfly and bird nesting check training.
- 91 out of a target of 100 Waterway Network volunteers recruited
- 1km of new hedgerow planted
- Planning permission for work on 'the missing mile' was approved February 2024

MOBILITY

Electric Vehicles

In September 2023, a financial commitment was made to roll out electric vehicle (EV) charge points at 7 public car parks in the district. Work was carried out to investigate grid capacity, civil engineering requirements and individual car park limitations. In all locations 7kw charge points are to be installed. 7kw chargers provide up to 30 miles of range per charge hour, allowing 'top up' charge for visitors, whilst primarily serving local residents for overnight use.

At the London Road Car Park we have the advantage of being able to both access a grid connection and use the existing power supply. This has allowed for the provision of six charging bays, two benefitting from faster 22kw charging. Wherever possible future expansion is being pre-installed as a 'passive supply'. This reserves the grid capacity, without the need to re-connect supply. It saves further trenching and the associated carbon expenditure.

As licence renewals become due, vehicles that are over 10 years old are not permitted to be renewed. Licence holders have been reminded that by April 2025 all vehicles must be Euro 6 compliant with an exception for wheelchair accessible vehicles.

Walking and Cycling

£75K has been allocated to resurface the full length of the Stonehouse to Stroud bike path, which is match funded by the Community Infrastructure Levy and Gloucestershire County Council.

Funding has been allocated to Transition Stroud to deliver an E-Bike hire scheme in the district, so that people can trial E-Bikes with the aim of increasing a swap over to decarbonised transport.

Walking has been encouraged through the Holiday Activities and Food programme (HAF) over Easter 2023 in Stroud and Dursley. The Discover Stroud trail app has been upgraded, to encourage people to explore their locality by foot, as well as the regular volunteer-led walks by SDC's Strolling in Stroud Districts initiative.

Bike parking facilities are being improved at Stratford Park with a covered bike store and some more bike hoops within Museum in the Park grounds.

ECONOMY

Ethical Investments

The SDC Ethical Investment Policy has again been approved by Councillors and applied consistently across the Council Portfolio. Investment has been withdrawn from areas scoring the lowest in the ethical investment assessment. In addition, the District Council has engaged with the County Council as part of its consultation on the Responsible Investment Policy for the Pension Fund.

The Council's Corporate Procurement Strategy has been updated to reflect the objectives of the Council Plan and current national best practice, it was approved in November 2023. The strategy has 4 procurement aims, one of which is to 'Drive Social Value from our procurements, including minimising the adverse environmental impact of services delivered by our suppliers, and supporting the local economy, and covers:

- Supporting the Local Economy
- Social Value
- Small and Medium Enterprises (SMEs) and Voluntary Community and Social Enterprises (VCSEs)
- Sustainability And Equalities In Procurement
- Partnership Working

There is also an annual procurement plan including performance indicators so progress against the procurement aims can be monitored and reported

As part of the the work we and other partner councils undertake as part of Climate Leadership Gloucestershire, funding has been secured to employ a Green Skills Coordinator. The objectives of this role are:

- Developing forums, events and workshops on retrofit and green skills to further explore the challenges and identify solutions with employers, training providers and relevant LA reps.
- Developing information campaigns targeted towards regional businesses to facilitate upskilling the workforce.
- Working with employers and training providers to provide targeted skills initiatives in rural, remote and deprived areas, where these can be made cost-effective
- Work with the Gloucestershire Careers Hub and with LEA colleagues to instil awareness of green/sustainable careers at earliest opportunities.
- Consider an appropriate approach for trainers, employers and LAs to satisfy PAS 2035 requirements.

Expected benefits include:

- Increased engagement between training provides, employers and industry, and local authorities on retrofit skills development and supply chains.
- Increased numbers of people training and re-training in retrofit skills.
- High rate of trainees moving to in-county employment.
- Reduction in identified retrofit skills gaps.
- Increased certainty for all stakeholders on the future of retrofit skills within county.
- Increased proliferation of retrofit advisors, assessors, and most importantly coordinators across the county's retrofit/construction industry
- Industry satisfaction with skills provision from employers

CASE STUDY

Stroud District: The Natural Place

Leaders from across the business sector have joined up with Stroud District Council in a new venture to help encourage more investment in Stroud district. Stroud District: The Natural Place is an online prospectus aimed at stimulating investment in the district by helping people find out what makes our place, our people and our businesses so special. It helps enterprises which want to establish themselves in the district, as well as existing businesses which want to expand or diversify.

The online prospectus www.strouddistrict.co.uk showcases the district's Green economy, innovation workforce, work-life balance, infrastructure, investment opportunities, tourism, climate and ecology commitments, culture and heritage, and case studies feature some of the great businesses and projects already based here. It also explains more about green and agricultural technologies, advanced manufacturing, distribution and logistics, microbusinesses and ;SME and creative industries.



Council Leader Catherine Braun:

“Our ambition for economic development is to support a sustainable, thriving and resilient economy for business, communities and visitors. We set ourselves the task of promoting the Stroud district to attract more investment, focusing on environmental technologies, engineering and manufacturing and creative industries. The Natural Place prospectus does just this and we are excited to see who will choose our district as the place for innovation.”

WASTE AND RESOURCES

Greener waste collections

We've introduced an 'In cab' system to our waste collection vehicles in 2023, digitalising workflows and reducing mileage by sending jobs direct to the cab, rather than waiting for return to the depot. This system also allows work to be made zonal, which reduces miles driven.

A fleet replacement strategy has been implemented, which will replace ageing vehicles with those that have the latest "Euro 6" technology. "Euro 6" is the name given to a set of limits for harmful emissions produced by a vehicles internal combustion engines

As part of this strategy, we have committed funding for the provision for an alternative fuel (hydrogenated vegetable oil) where electric vehicles as a replacement could currently compromise service. Switching to HVO requires no vehicle alternations but will reduce "well to wheel" carbon emissions by 80-90%

Messaging

There has been over 2,500 engagements with SDC led social media posts promoting behaviour change through the celebration of the district's great recycling rates.

Other SDC social media posts have encouraged participation with national and local climate action and sustainability events e.g. World Refill Day and supported DIY bike repair opportunities.



COMMUNITY

Events and displays

A set of community led 'Love where you live' events have been held with SDC tenants and officers, cleaning up SDC estates for the benefit of people and wildlife. Additional co-benefits to these events include increasing residents' mental health and reducing stress. There are plans afoot for developing wildflower gardens on site.

The 'Road Less Travelled' display at the Museum in the Park explored how local people used to commute to work in the first half of the 20th century, with the aim to encourage reflection on visitors' own commute. They were then invited to record how they travelled to the Museum and to calculate the carbon footprint of their commute.

SDC grant funding has continued to support the development of the Climate Action Network (CAN). This grant has been used to continue CAN communications and 1-2-1 support as well as resource project time to further support CANs with District-wide infrastructure and local practical action projects.

Stroud District Councils work to liaise with farmers continued by hosting the first meeting of a Stroud Farmer group. This aimed to help farmers support each other and provide some guidance on the various agri-environment schemes available and the funding options associated with such schemes. The longer term plan is to enable farmers to increase their understanding of alternative land management techniques relating to nature recovery and addressing the loss of biodiversity.

Last year SDC partnered with Stroud Valleys Project to plant more than 5,000 trees in a field owned by SDC at Salmon Springs in Stroud, then we dug in ponds to encourage more wildlife. This year, volunteers put in some suitable plant ponds and we had immediate proof that what we are doing is working as a beautiful dragonfly landing and laid its eggs in front of their eyes.

The role of social media

Messaging, averaging more than one-per-week of news stories, press releases, radio interviews or social media posts, celebrating climate and sustainability actions across the district and highlighting national events for people to get involved with encouraged, supported and inspired people about climate action.

CASE STUDY

Broader representation in climate action

‘Stroud District youth Council (SDYC) are pleased to report that there has been more community work occurring in the district this year regarding the theme of climate change, especially that relevant to and involving young people. The 2030 Community Engagement Board itself has been working with SDYC on intergenerational discussions on the objectives in the 2030 plan.

The facilitation of discussions between young people and adults, especially educators and activists, explored varying perspectives and opinions on the work of the board and that of SDYC’s Manifesto commitment (www.stroudyouthvoice.co.uk/manifesto). One intergenerational event, set within the time frame of COP28, led to a very informative and in-depth discussion that taught everyone something new about people’s thoughts and concerns about environmental matters. The work that some SDYC members have been part of, has been very informative of the way people view climate change and climate action, as well as what already exists locally.

Being involved with the 2030 Community Engagement Board, representatives from SDYC have also helped explore climate change denial and how to help people feel more empowered rather than paralysed. We look forward to continuing our work during the year ahead.’

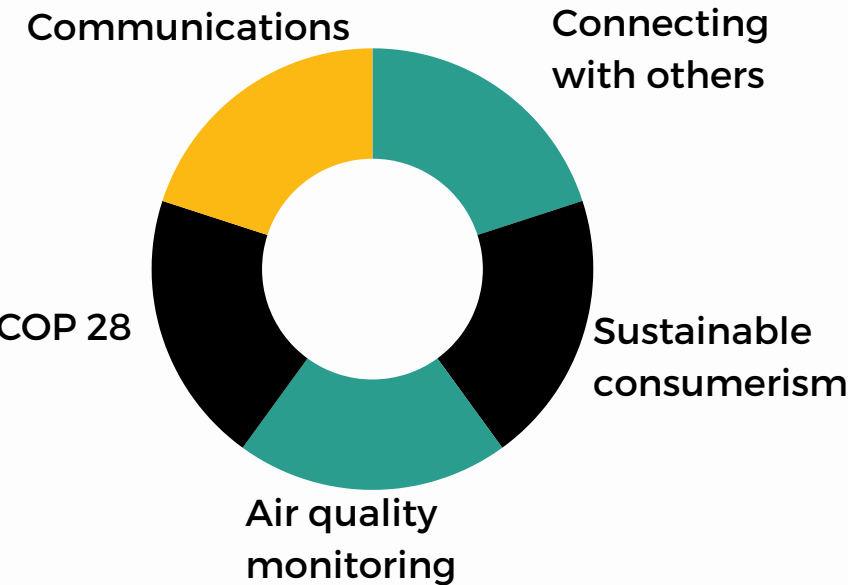
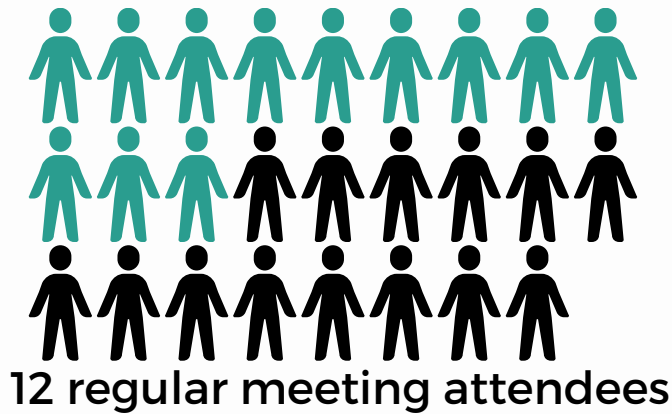
Cate James-Hodges – SDYC Leader

Megan Land – SDYC Principal Member for Environment

2030 COMMUNITY ENGAGEMENT BOARD

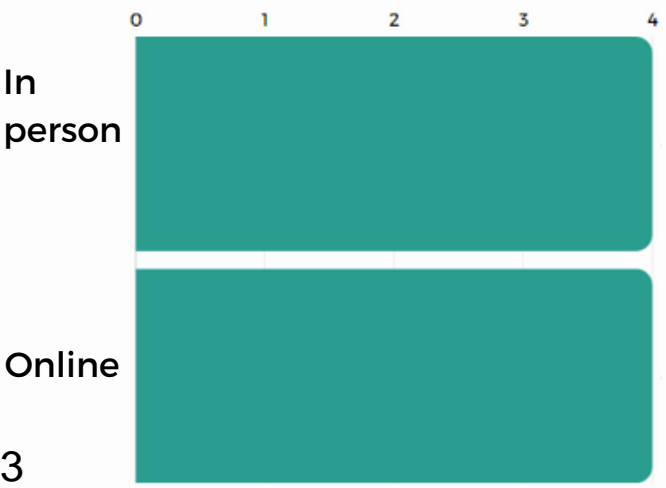
The 2030 Community Engagement Board (2030CEB) has completed its second year of facilitation with Ann Finlayson from Sustainability and Environmental Education (SEEd) with the aim to generate ownership of community based climate action. 2030CEB has grown in strength with expert input from others around e.g. air quality and communications. There is a committed, cohesive group of approximately 12 volunteer changemakers who connect with a range of networks in the district. We're in a great place to progress into year 3 (mentioned in the forward look!).

26
Official members



5
Topics deep-dived

8
Facilitated meetings



FORWARD LOOK

EXEMPLAR

We want our own efforts to reflect continual improvement, and so will be assessing of all aspects and impacts across the council that do, or could have, an impact on the environment. From this we will develop and implement vital management systems to ensure we are doing our best at all times, and can monitor our progress.

ENABLER

As our membership with the countywide forum Climate Leadership Gloucestershire (CLG) enters its third year, we are making greater resource commitments so that our impact as a council, alongside other members, can be even bigger. As theme lead for retrofit, we will be doing all in our power to enable homeowners to reduce their footprint and increase the efficiency of their homes.

ENCOURAGER

Stroud District Council will encourage the strengthening of networks in support of positive climate and sustainability actions through e.g. further Farmer Cluster support groups, SDYC events, continued financial support to Transition Stroud projects and costs and by 2030CEB members mentoring established community groups through climate action projects. These actions will have more representation in SDC's communications.



STROUD DISTRICT COUNCIL

ENVIRONMENT COMMITTEE

THURSDAY, 21 MARCH 2024

Report Title	Grass Cutting and Memorial Plaques			
Purpose of Report	To seek approval for an alteration to the grass cutting regime in the district and to formalise a process for the installation of memorial plaques.			
Decision(s)	The Committee RESOLVES to: a) Agree the alterations to provision outlined in the report. b) Give delegated authority to the Community Services Manager, in consultation with the relevant stakeholders, to alter the grass cutting regime in specified areas and in line with the rationale outlined in the report.			
Consultation and Feedback	SLT were briefed on 20 th February 2024 and officers from Community Services have been working with the Strategic Lead for Nature Recovery and Biodiversity to develop these plans.			
Report Author	Mike Wardell, Senior Community Services Officer Email: mike.wardell@stroud.gov.uk Michael Towson, Community Services Manager Email: Michael.towson@stroud.gov.uk			
Options	Members could choose to reject the proposals, but this would hamper the councils drive to enhance biodiversity and nature recovery.			
Background Papers	None			
Appendices	Appendix 1 – Pages 56-58 of Annual Satisfaction Survey Appendix 2 – Equality Impact Assessment - Grass Cutting Appendix 3 – Equality Impact Assessment - Memorial Plaques			
Implications (further details at the end of the report)	Financial	Legal	Equality	Environmental
	Yes	Yes	Yes	Yes

1. Introduction / Background

- 1.1 Ubico undertake grounds maintenance work on behalf of SDC, predominantly cutting grass in the growing season and undertaking hedge cutting, leaf collection, back edging and other 'winter works' in the off season.
- 1.2 Almost all of the grass areas SDC manage, have been cut the same way for the past decade or more.
- 1.3 The district has around 90 square kilometres of SDC maintained grass. 30 square kilometres that is mown 4 times a year and almost 60 square kilometres that is mown 10 times a year.
- 1.4 These areas are owned and managed by 3 main stakeholders:
 - Community Services; managing all recreation and amenity land.

- Housing: managing all Housing owned land
- Gloucestershire County Council; managing GCC owned verges which SDC cut, by agreement.

1.5 With new nature recovery obligations and a keenness to illustrate best practice, now is a good time to review and alter operations, changing grass cutting to something more sustainable.

1.6 Section 4 of this report also recommends a change to a formal offer for memorial plaques. This will allow more residents to feel a sense of ownership towards our public open space and help contribute towards consistent improvement.

2. Proposal Grass Cutting

2.1 Cutting grass lessens biodiversity and its value as a habitat. This results in:

- fewer flowering plants
- less moisture retention
- less shade
- less fauna variety

2.2 By changing how we manage our grassland and reducing grass cutting, we can positively aid nature recovery and help reduce our carbon emissions produced in their management. This will encourage growth of wildflowers, a valuable food source for pollinators and create habitats for invertebrates, small mammals, and reptiles, within the grass itself.

2.3 However, any change needs careful consideration. Grass cutting can be polarising. The Annual Satisfaction Survey (pages 56-58; Appendix 1) illustrated that whilst 89% of respondents supported initiatives like 'no Mow May', a small majority supported a continuation of our existing grass cutting provision.

2.4 Therefore, it's important to note that the majority of grass cut by SDC will remain under the same regime. As part of this proposal, up to 25% of grassland will be managed differently.

2.5 Initially and with immediate effect, we propose grass will only be cut around the base of any tree, once per annum. The benefits of this are twofold:

- To improve tree health; lessening soil compaction and unintended abrasion, reducing long term maintenance costs.
- To improve biodiversity and habitats for wildlife.

2.6 We have approximately 1500 trees in scope and a minimum ring of 1m radius around each tree, would create a conservative 18,000sqm of enhanced habitat. That's as much as 3 football pitches.

2.7 Furthermore, Ubico will begin to plant spring bulbs and wildflower seeds at the base of each tree on a rolling programme. This will further help aerate the soil and increase biodiversity, by introducing plants favourable for pollinators, whilst adding a splash of colour and brightness to the district.

2.8 Thereafter and on a phased basis over the next two years, we'll be looking to identify appropriate areas of grassland for rewilding and reduced mowing.

2.9 The vast majority of these new areas would be cut once per annum, although border cuts will be undertaken more regularly, to ensure a degree of care and management, as well as

maintaining good access for hedge and fence lines. Where size is suitable, pathways and resting areas will be mown in, to allow the space to still be used by residents.

- 2.10 Factors such as recreational use, proximity to housing and visibility lines will be taken into account and agreement will be sought, either via resident consultation, or in collaboration with town and parish councils, for general recreation and amenity land.
- 2.11 Not all our grass will be suitable for this change. However if we were to change just 25% of it, we will have created approximately 22.5 square kilometres of additional habitat, from areas with little to no ecological value.
- 2.12 In addition to creating new habitat, it will also create a time saving for grounds operatives. Initially this will be negligible, but upon achieving 25% change, we anticipate an approximate saving of 15-20 operative hours per week. This saving, from April-August each year, will be re-invested into service delivery across the district, allowing areas that are overlooked, or currently under managed during the summer months, to have the required resource. Borders, hard standing areas, and overgrowth of hedges are among those that will be positively impacted, for the betterment of the district.
- 2.13 Between September-October when lots of the annual grass cutting will take place and November-March, when winter works are carried out, there will be no change to resourcing.
- 2.14 The summertime savings will also enable a degree of additional litter picking, should the changes increase litter levels.
- 2.15 As well as time there will be a small financial impact. Mowers will be used less, equating to savings on fuel costs and vehicle maintenance.

3. Associated Communications

- 3.1 Working with our Communications Team, we'll advise residents of the changes in advance and reinforce the positive reasons for introduction.
- 3.2 We'll also invite residents to join us on our journey and consider re-wilding areas in their own gardens for example.

4. Memorial Plaques

- 4.1 Currently there are seven memorial benches on Selsley Common, each of which has been identified as needing to be repaired, or replaced.
- 4.2 Historically residents were given permission to site a bench, granted by the controlling officer. These permissions were given on an ad hoc basis, with no formalised agreement.
- 4.3 The clear issue is that demand has not been met and many requests haven't been able to be accommodated.
- 4.4 Siting benches allowing up to twenty-two chargeable memorial plaques to be affixed, will offer all families an opportunity to buy a lasting memorial. The scheme will be self-funding and create an additional revenue stream to be re-invested in public open spaces. Benches will initially be sited at Selsley Common, replacing the dilapidated benches and within Stratford Park.
- 4.5 Each plaque will cost £250. This includes engraving and fitment, for a 10-year period. After the 10 year period the customer will have the option to either renew for another 10 years at the same rate, or the plaque will be removed for collection. The full costings are illustrated in Table 1 below.

- 4.6 Officers have benchmarked other services on offer. Westonbirt Arboretum currently charge £305 for a similar scheme. Tyneside Council are charging £200 and Elmbridge Borough Council are charging £330 for the same service.
- 4.7 Community Services officers will reach out to existing bench owners, where we retain contact details, and a complimentary plaque will be offered to families.
- 4.8 No additional resourcing will be required; Ubico will install the plaques to the benches and any additional administration will be absorbed into the Community Services Team.
- 4.9 Customers will be able to book the plaque through an online ordering system to minimise officer handling times; this service will be managed by the Community Services team.

Table 1 – Table to illustrate costs and potential revenue (per bench)

	Bench* (including installation)	X22 Plaques (supply, engraving and installation)	Total
SDC Costs	£467.85	£550	£1,017.85
Potential Revenue			(£5,500.00)
Net Revenue			(£4,482.15)

*Benches will be made of recycled rubber, which is weather and rot resistant; benches come with a minimum 25-year life expectancy.

5. CONCLUSION

- 5.1 This report sets out proposals for a change to both grass cutting and memorial provision.
- 5.2 The grass cutting proposals represent a significant step towards improving biodiversity and will help to ensure SDC sets best practice in the field.
- 5.3 The proposal for memorial plaques offers greater choice for residents, offering a service in beautiful locations around the district. Furthermore, a small revenue stream is likely to be generated, which will be reinvested into public open space provision.
- 5.4 Officers have no reservations in recommending the proposals to members.

6. IMPLICATIONS

6.1 Financial Implications

There are financial implications within this report. Grass cutting decision will be to agree alterations to the provision, which if adopted will result in a small positive impact on the budget (p.2.15). Memorial plaques will attract a nominal outlay but will also generate a small revenue stream which will be reinvested into the open spaces provision. (Table 1 & p.5.3).

Adele Rudkin, Accountant

Tel: 01453 754109 Email: adele.rudkin@stroud.gov.uk

6.2 Legal Implications

The charges to be levied for the plaques represent the cost to the council for the purchase and engraving of the plaque and the right for the plaque to be sited on the bench for a hire period of 10 years. One Legal can assist in the preparation of hire terms and conditions.

One Legal can also assist in the preparation of a contract change notice to the Ubico contract for the variation to the grass cutting regime.

One Legal

Email: legalservices@onelegal.org.uk

6.3 Equality Implications

An EIA has been carried out by Officers in relation to the decision made in this report and due regard will be given to any implications identified in it.

6.4 Environmental Implications

The report sets out details of significant implications in relation to grass cutting [2.1-2.16]. *In addition and in relation to memorial plaques, it should be noted:*

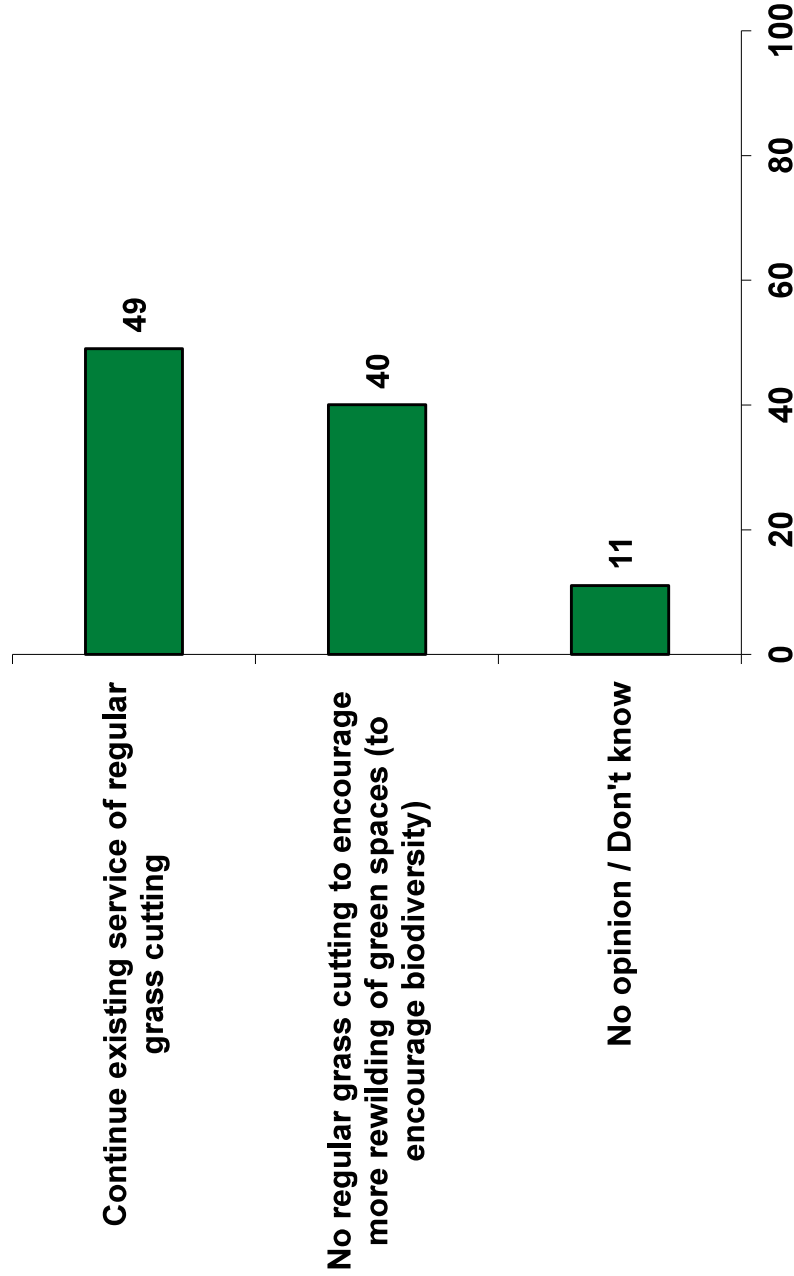
- A number of benches are currently located near, or on SSSI land. Replacement benches will be fitted onto the same locations, minimising any additional impact to the common.
- By utilising recycled rubber, the benches will have a lower carbon footprint over their lifetime, than timber benches.

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Grass Cutting

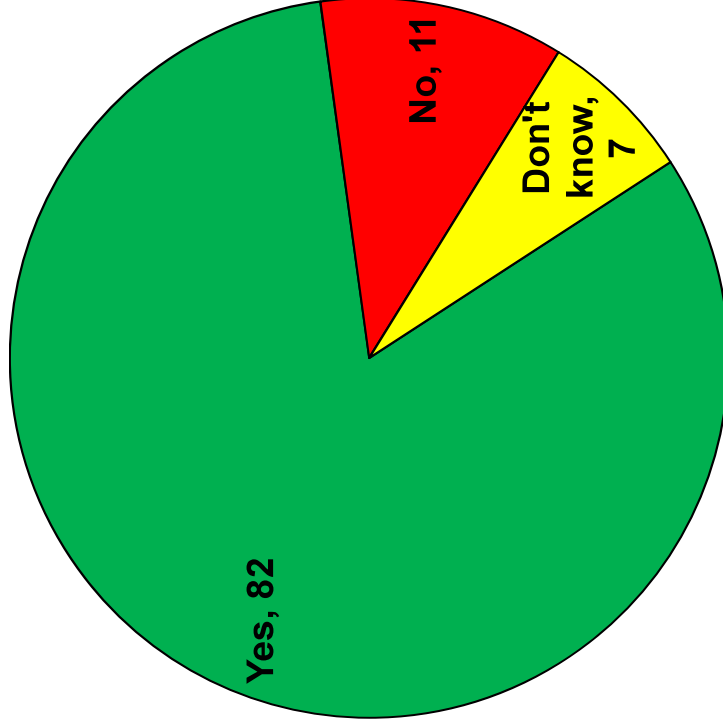
Q15a. Question 15a. Which of the following options do you prefer?
% respondents

- Residents were given two options in terms of grass cutting and ask which they preferred.
- 49% opted to *continue the existing service of regular grass cutting*, while 40% chose *no regular grass cutting to encourage more rewilding of green spaces*.
- Those most in favour of regular grass cutting were those aged 75+ * (64%) and those with a disability* (63%).
- Removing the don't know responses, 55% were in favour of *continuing the existing service of regular grass cutting*, while 45% chose *no regular grass cutting to encourage more rewilding of green spaces*.



Base: (500)

Q15b. Would you support an initiative such as “No Mow May” where grass is not cut during the month of May to encourage wildflowers and reduce pesticide use?
% respondents



- Residents were asked if they would support an initiative such as “No Mow May” where grass is not cut during the month of May to encourage wildflowers and reduce pesticide use.
- 82% said that they would support the initiative.
- Those most likely to say that they would support the initiative are those aged 35 – 54 (92%), BAME residents* (92%), those who are working (88%).
- 11% said that they would not support the initiative.
- Those aged 18 – 34 were most likely to say that they wouldn't support it (17%).

*Caution small base size

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Equality Analysis Form / EqIA

By completing this form you will provide evidence of how your service is meeting Stroud District Council's General Equality duty:

The Equality Act 2010 states that:

*A public authority must, in the exercise of its functions, have **due regard** to the need to –*

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by the Equality Act 2010;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The protected characteristics are listed in Question 9

Stroud District Equality data can be found at:

<https://inform.gloucestershire.gov.uk/equality-and-diversity/>

Please see Appendix 1 for a good example of a completed EIA.

[Guidance available on the HUB](#)

1. Persons responsible for this assessment:

Name(s): Mike Wardell	Telephone:
	E-Mail: mike.wardell@stroud.gov.uk
Service: Community Services	Date of Assessment: 7 th March 24

2. Name of the policy, service, strategy, procedure or function:

Grass Cutting

Is this new or an existing one?

3. Briefly describe its aims and objectives

- Change how Stroud District Council (SDC) manage grassed areas to improve health of tree stock by reducing soil compaction to the root system. This increase soil aeration and water retention allowing the tree to access nutrients efficiently and reducing stressors placed upon it.
- Assist with nature recovery and biodiversity through the district by increasing habitat and food sources vital for pollinators, other invertebrates, small mammals

and reptiles.

4. Are there external considerations? (Legislation / government directive, etc)

SDC has a statutory duty to have a local nature recovery plan and actively pursue a biodiversity net gain agenda.

5. Who is intended to benefit from it and in what way?

The benefits will not be to individuals but to the wider environment as a whole; this in turn can lead to improved wellbeing from the district's residents. Nature has a direct correlation to health and wellbeing. A connectedness to nature is associated with lower levels of poor mental health, particularly depression and anxiety.

6. What outcomes are expected?

- Improved nature recovery
- Increased biodiversity
- Decrease soil compaction to trees (i.e reducing stressors to them within SDC control, increasing their health and longevity)
- Improve nature corridors on SDC and GCC land.
- Reduce overall cutting times to improve land management on other grounds maintenance tasks.
- Care will be taken to ensure pavements are safe and accessible, and road sightlines are not obstructed.

7. What evidence has been used for this assessment? (eg Research, previous consultations, Inform (MAIDEN); Google assessments carried out by other Authorities)

- Discussions with experts on nature recovery, Strategic lead – nature recovery and biodiversity, SVP
- Reviewed against West Berkshire, Wiltshire & Sheffield
- Discussions with members of the SDC EDI group
- Discussion with Service Delivery manager, independent living

8. Has any consultation been carried out? See list of possible consultees

- Resident Survey Satisfaction
- Discussions with warden (ex-police service person) regarding potential ASB issues surrounding longer grassed areas (broken window theory).
- Discussion with Senior Housing Officer
- Discussion with SDC ASB and Enforcement Officer

9. Could a particular group be affected differently in either a negative or positive way?
(Negative – it could disadvantage and therefore potentially not meet the General Equality duty;
Positive – it could benefit and help meet the General Equality duty;
Neutral – neither positive nor negative impact / Not sure)

Protected Group	Type of impact, reason, and any evidence (from Q7 & 8)
Age	Negative. As people age, they can become more frail, which can have an impact on mobility. Stroud District also has an ageing population so there is an expectation of increased frailty throughout the district over the coming years.
Disability	Visually impaired, or those with reduced mobility may be disadvantaged due to increased height of fauna as additional trip hazards could be considered to be being made on what has traditionally been a more open area
Gender Re-assignment	neutral
Pregnancy & Maternity	neutral
Race	neutral
Religion – Belief	neutral
Sex	neutral
Sexual Orientation	neutral
Marriage & Civil Partnerships (part (a) of duty only)	Neutral
Rural considerations: le Access to services; transport; education; employment; broadband;	Negative

10. If you have identified a negative impact in question 9, what actions have you undertaken or do you plan to undertake to lessen or negate this impact?

Please transfer any actions to your Service Action plan on Excelsis.

Action(s):	Lead officer	Resource	Timescale
Clear, logical pathways will be cut through open spaces (this will also have the benefit of keeping the area looking intentionally managed, reducing the ‘broken window effect and helping to mitigate any ASB risks), where possible following any unofficial footpaths that had	Mike Wardell	Ubico	Ongoing, but to start at implementation of grass cutting change


Appendix B

<p>previously been walked in to minimise this impact. All marked footpaths and pavements will be kept free to ensure safe accessibility is maintained, with additional resources going into this endeavour utilised from the time savings of reduced mowing. This action is the same to combat potential risk for both older people and those with disability.</p>			

Declaration

I/We are satisfied that an Impact Assessment has been carried out on this policy, service, strategy, procedure, or function * (delete those which do not apply) and where a negative impact has been identified, actions have been developed to lessen or negate this impact.

We understand that the Equality Impact Assessment is required by the District Council and that we take responsibility for the completion and quality of this assessment.

<p>Completed by: M. Wardell</p>	<p>Date:</p>
<p>Role: Senior Community Services Officer</p>	<p>7th March 2024</p>
<p>Countersigned by Head of Service:</p> 	<p>Date:</p> <p>8th March 2024</p>

Date for Review: Please forward an electronic copy to policy@stroud.gov.uk

Equality Analysis Form / EqIA

By completing this form you will provide evidence of how your service is meeting Stroud District Council's General Equality duty:

The Equality Act 2010 states that:

*A public authority must, in the exercise of its functions, have **due regard** to the need to –*

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by the Equality Act 2010;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The protected characteristics are listed in Question 9

Stroud District Equality data can be found at:

<https://inform.gloucestershire.gov.uk/equality-and-diversity/>

Please see Appendix 1 for a good example of a completed EIA.

[Guidance available on the HUB](#)

1. Persons responsible for this assessment:

Name(s): Mike Wardell	Telephone:
	E-Mail: mike.wardell@stroud.gov.uk
Service: Community Services	Date of Assessment: 8 th March 24

2. Name of the policy, service, strategy, procedure or function:

Memorial benches

Is this new or an existing one? New

3. Briefly describe its aims and objectives

<ul style="list-style-type: none"> - To offer a formalised process for memorial plaques on Selsley Common and Stratford park - Reduce SDC's liability on existing benches installed on Selsley common

4. Are there external considerations? (Legislation / government directive, etc)

There are currently two benches located at the edge of the Site of Special Scientific Interest on Selsley common, which we will need to assess to see if they can be located in a more suitable space, and the common itself will need to be assessed prior to installation to ensure we are complying to legislation and/or best practise.

5. Who is intended to benefit from it and in what way?

Residents throughout stroud district; offering a formalised memorial plaque system will not only offer a straightforward and cost effective way of having a memorial for a loved one, it will in turn also increase the funds available to manage the areas they are placed. This will aid in nature recover and biodiversity on both the common and Stratford Park and overall improve the landscape on the district.

6. What outcomes are expected?

- New memorial benches installed, replacing existing ones on Selsley Common
- New memorial bench placed at Stratford park
- New revenue Stream for both Selsley Common and Stratford Park to be recognised

7. What evidence has been used for this assessment? (eg Research, previous consultations, Inform (MAIDEN); Google assessments carried out by other Authorities)

- Reviewed against Portsmouth & Derbyshire Council EIA on memorial Benches.
- Internal discussions EDI members

8. Has any consultation been carried out? See list of possible consultees

- Historical observations on benches installed, and requests made from the public have spurred this initiative.

9. Could a particular group be affected differently in either a negative or positive way?

(Negative – it could disadvantage and therefore potentially not meet the General Equality duty;

Positive – it could benefit and help meet the General Equality duty;

Neutral – neither positive nor negative impact / Not sure)

Protected Group	Type of impact, reason and any evidence (from Q7 & 8)
Age	neutral
Disability	Negative
Gender Re-assignment	neutral

Pregnancy & Maternity	Negative
Race	neutral
Religion – Belief	neutral
Sex	neutral
Sexual Orientation	neutral
Marriage & Civil Partnerships (part (a) of duty only)	Neutral
Rural considerations: le Access to services; transport; education; employment; broadband;	Negative

10. If you have identified a negative impact in question 9, what actions have you undertaken or do you plan to undertake to lessen or negate this impact?

Please transfer any actions to your Service Action plan on Excelsis.


Action(s):	Lead officer	Resource	Timescale
By offering Stratford Park as an alternative accessible location for memorials, we aim to mitigate the potential access issues surrounding Selsley common, meaning all can access the new service if desired.	Mike Wardell	Stratford Park	Installation of accessible memorial bench at Stratford Park when project goes live.
Both selected sites are close to Stroud Town; this may mean those in more rural locations in the district find it more difficult to utilise the service. SDC are however limited to appropriate locations under our control. There is other provision offered elsewhere in the district by other organisations such as Westonbirt arboretum (memorial tree) to limit this as an issue. Once the project has started, alternative locations can be assessed based on demand.	Mike Wardell	Officer Time	Ongoing investigation for alternative spaces based on demand from residents.

Appendix C

Declaration

I/We are satisfied that an Impact Assessment has been carried out on this policy, service, strategy, procedure or function * (delete those which do not apply) and where a negative impact has been identified, actions have been developed to lessen or negate this impact.

We understand that the Equality Impact Assessment is required by the District Council and that we take responsibility for the completion and quality of this assessment.

Completed by: M. Wardell	Date:
Role: Senior Community Services Officer	8th March 2024
Countersigned by Head of Service: 	Date: 8th March 2024

Date for Review: Please forward an electronic copy to policy@stroud.gov.uk

STROUD DISTRICT COUNCIL
ENVIRONMENT COMMITTEE
THURSDAY, 21 MARCH 2024

Report Title	Severn Estuary Special Protection Area (SPA), Special Area of Conservation (SAC) & Ramsar Mitigation Strategy			
Purpose of Report	To approve the Severn Estuary Recreation Mitigation Strategy for avoidance of likely significant adverse effects on Special Protection Area (SPA), Special Area of Conservation (SAC) & Ramsar.			
Decision(s)	The Committee RESOLVES to approve the Severn Estuary SPA, SAC Ramsar Recreation Mitigation Strategy for avoidance of likely significant adverse effects on the Special Protection Area (SPA) and Special Area of Conservation (SAC).			
Consultation and Feedback	The Local Plan and supporting evidence have been subject to public consultation. Over the last couple of years, the Council has worked collaboratively with our Consultants Footprint Ecology and Natural England as well as other relevant stakeholders to draft this mitigation strategy. The matter was discussed at the Examination in Public and Council Officers gave a commitment to update the current adopted Severn Estuary Recreation and Mitigation Strategy (2017).			
Report Author	Conrad Moore, Principal Planning Officer Email: conrad.moore@stroud.gov.uk			
Options	The Council may decide not to approve the mitigation strategy. However, development proposals within the zone of influence (ZOI) of the Cotswold Beechwoods and Rodborough Common SACs within this District would still be required to take account of published research findings and recommendations. It is likely that Natural England (NE) will raise objections to planning applications involving an increase in houses within the vicinity of both the Cotswold Beechwoods SAC and Rodborough Common on the grounds that the resulting recreational pressure may threaten protected national habitats and species. The adoption of these Strategies will assist effective and efficient planning decision-making in accordance with national legislative requirements and advice.			
Background Papers	2022 Severn Estuary Visitor Survey			
Appendices	Appendix A – 2024 Severn Estuary Mitigation Strategy			
Implications (further details at the end of the report)	Financial	Legal	Equality	Environmental
	Yes	Yes	No	Yes

1. Introduction / Background

- 1.1 A Habitats Regulations Assessment (HRA) refers to the several distinct stages of Assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it. European Sites and European Offshore Marine Sites identified under these regulations are now referred to as 'habitats sites' in the National Planning Policy Framework.
- 1.2 All plans and projects (including planning applications) require consideration of whether the plan or project is likely to have significant effects on habitats sites. This consideration –referred to as the 'Habitats Regulations Assessment screening' – should take into account the potential effects both of the plan/project itself and in combination with other plans or projects. Where the potential for likely significant effects cannot be excluded, the Council must make an appropriate assessment of the implications of the plan or project for that site, in view of the site's conservation objectives. The Council may agree to the plan or project only after having ruled out adverse effects on the integrity of the habitats site. Where it cannot be concluded that there will be no adverse effects on a site's integrity, there is a need to consider mitigation. Mitigation measures are protective measures forming part of a project and are intended to avoid or reduce any direct adverse effects that may be caused by a plan or project, to ensure that it does not have an adverse effect on the integrity of a habitats site(s).
- 1.3 The 2022 Gloucestershire Severn Estuary visitor survey results have informed the production of this updated mitigation strategy to address the cumulative effects of housing growth across a wide area, spanning multiple authorities. This report has therefore been commissioned by Cheltenham Borough Council, Cotswold District Council, Forest of Dean District Council, Gloucester City Council, Stroud District Council and Tewkesbury Borough Council working in partnership to broadly span much of the area from the Severn Bridge to Tewkesbury.

2. Main Points

- 2.1 The Severn Estuary SAC/SPA/Ramsar is one of the largest estuaries in Europe and is internationally important for the habitat and species the estuary supports. Saltmarsh fringes the coast backed by grazing marsh with freshwater ditches and occasional brackish ditches. The subtidal seabed is rock and gravel with subtidal sandbanks. The site also supports reefs of the tube forming worm *Sabellaria alveolata*. The estuary's classic funnel shape, unique in the UK, is a factor causing the Severn to have one of the highest tidal ranges in the world. A consequence of the large tidal range is an extensive intertidal zone, one of the largest in the UK.
- 2.2 The site qualifies as a Special Area of Conservation (SAC) for a range of coastal habitats and for three fish species. The Severn Estuary Special Protection Area (SPA) is classified for its waterbird assemblage and for a range of species that occur on passage/over winter including a range of both wildfowl and wader species. The Ramsar interest overlaps with the SAC and SPA features and includes the bird interest. The bird populations associated with the estuary move widely and make use of a range of sites away from the estuary during the course of the winter. Waterbodies, wetlands and low-lying farmland within the can provide important feeding and roost sites which may vary in importance within a season and across years, depending on water-levels, food availability and a range of other factors. While such sites lie outside the SPA they are functionally linked in that they play a role in supporting the relevant bird interest.

2.3 In the UK, many of our most important nature conservation sites have legal rights of access, for example through Public Rights of Way or Open Access through the Countryside and Rights of Way Act (CRoW) 2000. Access is important with benefits in terms of health, well-being, economic, engagement, aspects, something that Increasing awareness of importance of connecting with nature and being outside – Covid has brought to fore. People are often drawn to such sites as they are large, scenic and often few other alternatives exist. There can therefore be a difficult balancing act between providing for an increasing demand for access without compromising the integrity of protected wildlife sites. Potential impacts of recreation to the Estuary relate to the following broad pathways:

- Damage (e.g. direct harm to vulnerable features from wear and footfall, e.g. trampling of saltmarsh vegetation)
- Contamination (potentially quite limited impacts given the qualifying features, however could include eutrophication through dog faeces/urine, water quality as a result of dogs entering water bodies)
- Fire (e.g. from barbeques and a risk to reedbeds)
- Disturbance (e.g. impacts to birds from the presence of people, dogs etc.)
- Other (public opposition to management, difficulty in grazing etc.)

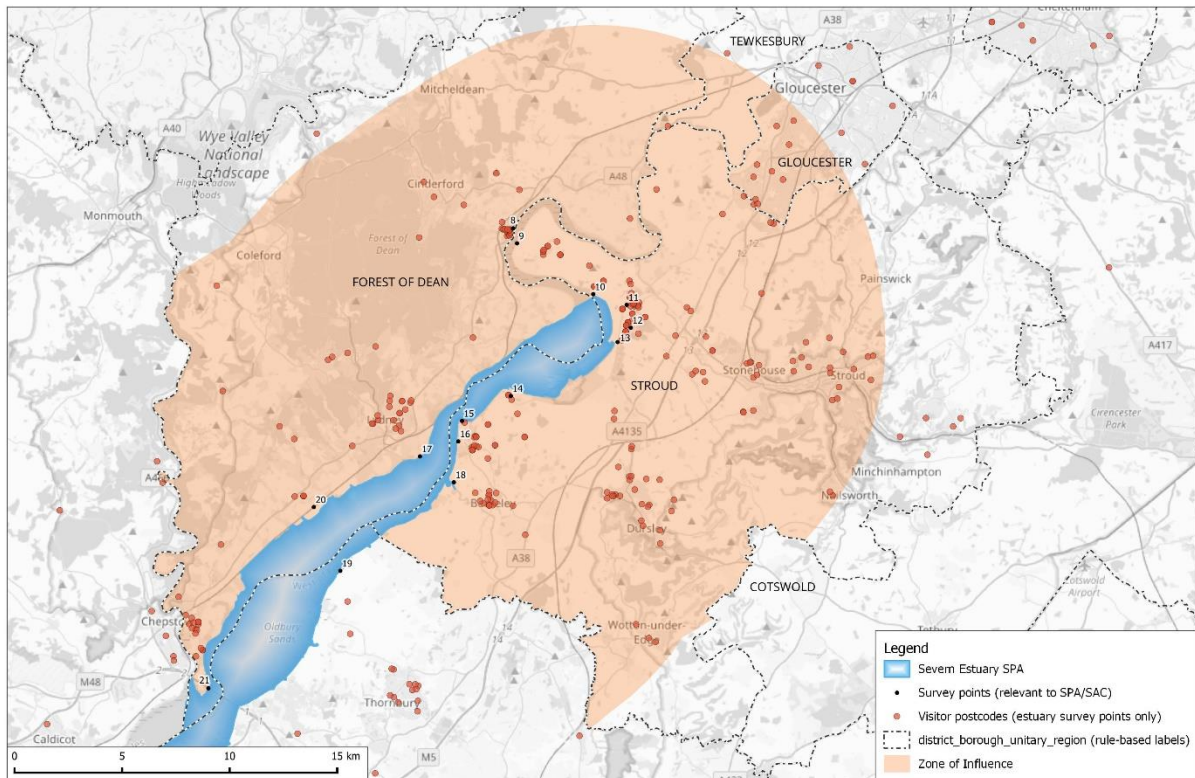
A visitor survey completed in 2022 shows 586 interviews of which 93% of interviewees on short trip directly from home and 49% of interviewees dog walking. Further information is available in the visitor survey such as the median dog walk = 2.25km (max over 17km) and median for walking = 2.28km. It is interesting to note that at Berkeley Pill the median route length = 7.31km. Disturbance to the wintering and passage bird interest is the principal concern and is relevant to the SPA and Ramsar features. Disturbance to wintering and passage waterfowl can result in:

- A reduction in the time spent feeding due to repeated flushing/increased vigilance (Fitzpatrick and Bouchez, 1998; Stillman and Goss-Custard, 2002; Bright *et al.*, 2003; Thomas, Kvitek and Bretz, 2003; Yasué, 2005)
- Increased energetic costs (Stock and Hofeditz, 1997; Nolet *et al.*, 2002)
- Avoidance of areas of otherwise suitable habitat, potentially using poorer quality feeding/roosting sites instead (Cryer *et al.*, 1987; Gill, 1996; Burton *et al.*, 2002; Burton, Rehfish and Clark, 2002)
- Increased stress (Regel and Putz, 1997; Weimerskirch *et al.*, 2002; Walker, Dee Boersma and Wingfield, 2006; Thiel *et al.*, 2011).

2.4 Local Plans set the levels of housing growth and allocate land for development. The strict protection afforded to European sites means that a local planning authority, as competent authority, should only adopt a plan where it can be ascertained that there will not be an adverse effect on the integrity of any European site(s).

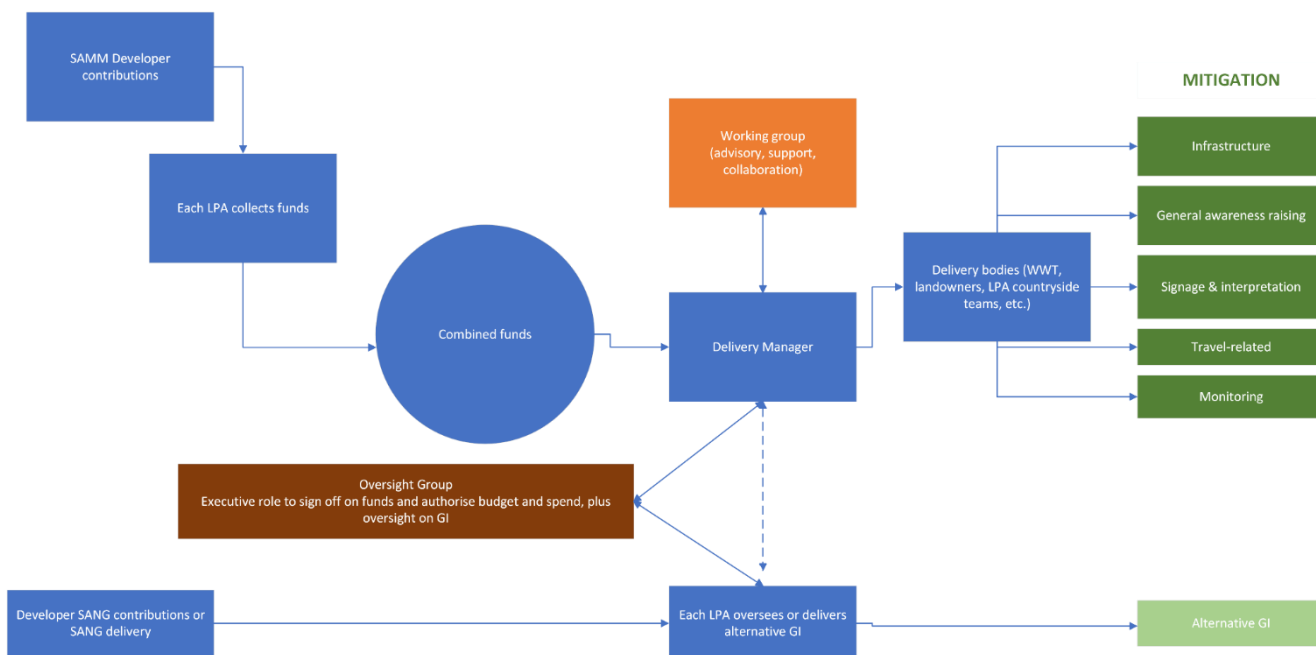
2.5 The Council is working in partnership with relevant Councils in Gloucestershire to provide a framework under which applications for development likely to have a significant effect on the Cotswold Beechwoods SAC can be permitted, with measures in place to ensure that adverse effects on the integrity of the SAC can be ruled out. Joint working on this project has been incorporated into the Local Plan Examination documentation such as the Statements of Common Ground (SOCG). This should safeguard and facilitate development, while ensuring sufficient protection in place for the SAC. The Strategy applies to larger developments, which may affect the integrity of these sites alone, and smaller developments where cumulative effects may be the critical factor.

Map 1: Zone of influence and visitor survey postcodes



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- 2.6 Like the adopted Rodborough Common SAC and the Cotswolds Beechwoods SAC mitigation strategies all new residential growth around the Severn Estuary will be expected to provide mitigation but here within the identified 12.6km Zone of Influence identified below (that arise from earlier 2022 Visitor Survey results) shown on Map 1.
- 2.7 Mitigation will consist of SAMM (Strategic Access Management and Monitoring) and SANG / infrastructure projects away from the Severn Estuary. These two approaches would complement each other. SAMM measures at the Severn Estuary are required to address recreation impacts and make the SAC more resilient to any increased recreation. SAMM would comprise: Dedicated staff; Signs and interpretation; Education & awareness raising; Parking and travel related measures; Monitoring. The value of £521.95 per dwelling is in line with other SAMM tariffs for National sites or lower. There will be an administration fee of £100.00 for application legal agreements submitted from June 1st 2024. S106 Agreements will be individually negotiated and dependent upon the complexity of said agreement. Unilateral undertaking templates, as with Rodborough Common and Cotswolds Beechwoods remain available.
- 2.8 Suitable Alternative Natural Greenspace (SANG) are created, or existing greenspaces enhanced, in order to absorb the level of additional recreation pressure associated with new development. Some projects will be expected to be delivered directly by developers through on-site provision (according to guidelines set out in this strategy). Where a development or alternatively, where such bespoke SANG is not possible, through contributions. Where a contribution is collected for off-site SANG provision, this will be at a standard rate of £480 per Dwelling. Where zones of influence, such as the Cotswolds Beechwoods, overlap with the Severn Estuary, multiple SANG payments will not be necessary.



2.9 Council officers have worked with adjoining authorities and statutory stakeholders to propose a new governance structure. The recommended approach is set out in Figure 1 overleaf.

Figure 1 Governance Structure

3. Conclusion

3.1 In accordance with our statutory duties under the Habitats Regulations Assessment and the evidence base which accompanies the Local Plan it is concluded that recreation and mitigation strategies are necessary. The Severn Estuary Recreation and Mitigation Strategy will deal with the impact of development upon this international site of acknowledged importance. It is therefore recommended that the Severn Estuary Recreation Mitigation Strategy be approved for the avoidance of likely significant adverse effects following work with relevant parties, statutory bodies and agencies. This HRA evidence work is necessary for the Local Plan to continue to be found legally compliant and sound.

4. Implications

4.1 Financial Implications

There is a cost neutral implication to the Council as the strategies envisage only developer contributions being used to deliver the mitigation required, administered by the Council (managed within existing resources (CIL) subject to an additional administration fee) with any spend against the funds overseen by the oversight groups.

Adele Rudkin, Accountant

Tel: 01453 754109 Email: adele.rudkin@stroud.gov.uk

4.2 Legal Implications

The legal implications are set out in the body of the report.
Martin Evans – Locum Planning Lawyer

Tel: 01684 272227 Email: legalservices@onelegal.org.uk

4.3 Equality Implications

There are no equality implications arising from this report.

4.4 Environmental Implications

The report above sets out the details of significant implications in the Introduction / Background section and in Paragraph 3.1.



Severn Estuary Recreation Mitigation Strategy 2024-2029

Durwyn Liley & Zoe Caals

FOOTPRINT ECOLOGY, FOREST OFFICE, BERE ROAD,
WAREHAM, DORSET BH20 7PA
WWW.FOOTPRINT-ECOLOGY.CO.UK
01929 552444



FOOTPRINT
ECOLOGY

Footprint Contract Reference: 681

Date: 3rd March 2024

Version: Final

Recommended Citation: Liley, D. & Caals, Z. (2023). Severn Estuary Recreation Mitigation Strategy 2024 – 2029. Report by Footprint Ecology.

Summary

This strategy sets out the mitigation requirements relating to impacts from recreation (associated with new housing and tourism development) on the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site. The Severn Estuary is of exceptional nature conservation importance, and the strategy ensures the relevant local authorities (Forest of Dean, Gloucester City, Tewkesbury and Stroud) meet legislative requirements and adequately protect the sites when permitting development.

This strategy is an update to the existing strategy (established for Stroud District only in 2017) and extends the approach to cover a wider area. This strategy covers the period 2024-2041, however it will be subject to review on at least a five yearly basis.

Mitigation measures comprise:

- SAMMS (Strategic Access Management and Monitoring); and
- Off-site infrastructure (including SANGs – ‘Suitable Alternative Natural Greenspace’).

By addressing risks up front, the strategy provides a proactive, cross-boundary solution that ensures cumulative impacts of growth are taken into account. The strategy ensures necessary resources and costs are identified and provides clarity for developers when bringing forward sites for development.

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Acknowledgements

This document has been commissioned by Stroud District Council on behalf of a consortium of planning authorities comprising Cotswold District Council, Forest of Dean District Council, Gloucester City Council, Stroud District Council and Tewkesbury Borough Council. Our thanks to Conrad Moore (Stroud District Council) for overseeing the commission.

A workshop was held on the 2nd October 2023 to help identify potential mitigation measures and a number of people also fed in ideas and suggestions outside that workshop. Thanks to the following for useful discussion and input: Cathy Beeching, Rebecca Charley (Stroud District Council), Ruth Clare (Environment Agency), Esther Collis (Stroud District Council), Luke Etheridge (Stroud District Council), Celia Fallon (Natural England), Jane Hennell (Canal and Rivers Trust), Katie Havard-Smith (Severn Estuary Partnership and Association of Severn Estuary Relevant Authorities 'ASERA'), Cllr Haydn Jones (Stroud District Council), Emma Hutchins (Gloucestershire Wildlife Trust), Juliet Hynes (Gloucestershire Wildlife Trust), David Ingleby (Gloucester City Council), Ellie Jones (Wildfowl and Wetlands Trust), Grace Lewis (Network Rail), Caroline Lidgett (Forest of Dean District Council), Sarah Macaulay-Lowe (Gloucestershire County Council), Conrad Moore (Stroud District Council), Eric Palmer, Liam Reynolds (Severn Rivers Trust), James Rowlinson (Environment Agency), Mike Smart, Orlando Venn (Wildfowl and Wetlands Trust), Sarah Wells (FWAG), Jeff Wheeler (Gloucestershire County Council), Rob Willcocks (Severn Rivers Trust) and Robert Williams (Canal and Rivers Trust).

1. Introduction & purpose of this strategy

Overview

- 1.1 This strategy relates to housing and tourism development around the Severn Estuary, within the local planning authority areas of Forest of Dean District Council, Gloucester City Council, Stroud District Council and Tewkesbury Borough Council. Cheltenham Borough Council Cotswold District Council were also involved in the original commission and initial evidence gathering (visitor surveys) that that inform the strategy.
- 1.2 The strategy sets out the mitigation requirements relating to the nature conservation impacts of new development on the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site and provides measures for the authorities to implement, to give them certainty that they are adequately protecting the wildlife site from the impacts of residential and tourism growth.

The Severn Estuary SAC/SPA/Ramsar

- 1.3 The Severn Estuary is one of the largest estuaries in Europe and is internationally important for the habitat and species the estuary supports. Saltmarsh fringes the coast backed by grazing marsh with freshwater ditches and occasional brackish ditches. The subtidal seabed is rock and gravel with subtidal sandbanks. The site also supports reefs of the tube forming worm *Sabellaria alveolata*.
- 1.4 The estuary's classic funnel shape, unique in the UK, is a factor causing the Severn to have one of the highest tidal ranges in the world. A consequence of the large tidal range is an extensive intertidal zone, one of the largest in the UK.
- 1.5 The site qualifies as a Special Area of Conservation (SAC) for a range of coastal habitats and for three fish species. The Severn Estuary Special Protection Area (SPA) is classified for its waterbird assemblage and for a range of species that occur on passage/over winter including a range of both wildfowl and wader species. The Ramsar interest overlaps with the SAC and SPA features and includes the bird interest. Further details of the conservation importance and qualifying features for the Estuary are summarised in Appendix 1.

- 1.6 The bird populations associated with the estuary move widely and make use of a range of sites away from the estuary during the course of the winter. Waterbodies, wetlands and low-lying farmland can provide important feeding and roost sites which may vary in importance within a season and across years, depending on water-levels, food availability and a range of other factors. While such sites lie outside the SPA they are functionally linked in that they play a role in supporting the relevant bird interest (see Chapman and Tyldesley, 2016 for further definitions, background and context). Key locations within the Severn Vale are described by Palmer and Smart (2021) who identified 21 sites that held more than the equivalent of 1% of the SPA population of one or more species for 50% or more of months within one or more of three WeBS counting seasons.
- 1.7 The SAC, SPA and Ramsar designations mean the Severn Estuary is among the top tier of nature conservation sites in the UK and comprises part of the 'National Site Network'. These Habitats Sites or European Sites are afforded the strict protection through the Habitats Regulations 2017 (as amended).

Legislative context

- 1.8 Under the Habitat Regulations, a competent authority should only give effect to a plan or authorise/undertake a project after having ascertained that it will not adversely affect the integrity of the European site, either as a result of the plan/project alone or in-combination with other plans/projects. This means that in the absence of certainty, the plan or project should not normally proceed (subject to the further exceptional tests set out within the legislation). The definition of a plan or project is broad (see Tyldesley and Chapman, 2021) and extends to local plans produced by local planning authorities.
- 1.9 Mitigation measures are counteracting measures that serve to avoid, cancel or reduce harmful effects. Guidance (Tyldesley & Chapman, 2021) is clear that, to be taken into account, at the appropriate stages, all 'mitigation measures' should be effective, reliable, timely, guaranteed to be delivered and as long-term as they need to be to achieve their objectives.

Impacts of recreation

- 1.10 Potential impacts of recreation to the Estuary relate to the following broad pathways:

- Damage (e.g. direct harm to vulnerable features from wear and footfall, e.g. trampling of saltmarsh vegetation)
- Contamination (potentially quite limited impacts given the qualifying features, however could include eutrophication through dog faeces/urine, water quality as a result of dogs entering water bodies)
- Fire (e.g. from barbeques, campfires etc and potentially a risk to habitats such as reedbeds)
- Disturbance (e.g. impacts to birds from the presence of people, dogs, craft etc.)
- Other (public opposition to management, difficulty in grazing etc.)

1.11 Disturbance to the wintering and passage bird interest is the principle concern, and is relevant to the SPA and Ramsar features. Disturbance to wintering and passage waterfowl can result in:

- A reduction in the time spent feeding due to repeated flushing/increased vigilance (Fitzpatrick and Bouchez, 1998; Stillman and Goss-Custard, 2002; Bright *et al.*, 2003; Thomas, Kvitek and Bretz, 2003; Yasué, 2005)
- Increased energetic costs (Stock and Hofeditz, 1997; Nolet *et al.*, 2002)
- Avoidance of areas of otherwise suitable habitat, potentially using poorer quality feeding/roosting sites instead (Cryer *et al.*, 1987; Gill, 1996; Burton *et al.*, 2002; Burton, Rehfish and Clark, 2002)
- Increased stress (Regel and Putz, 1997; Weimerskirch *et al.*, 2002; Walker, Dee Boersma and Wingfield, 2006; Thiel *et al.*, 2011).

1.12 Issues are associated with a range of activities including those on the shore (walking, dog walking etc.), on the water (such as jet skis, kayaks and paddleboards) and in the air (drones, paragliders and other airborne craft). The issues are long standing. For example, Habitats Regulations Assessment (HRA) work that accompanied the Stroud Local Plan around 2016 recognised that while baseline levels of recreational pressure on the Estuary were relatively low, disturbance could still have a high impact and recreational use was likely to increase as new housing, employment and tourism development comes forward. A likely significant effect on the conservation status of the site's qualifying features could not be ruled out and Stroud District Council therefore established a mitigation strategy (Stroud District Council, 2017). Around 2016, Forest of Dean District Council also commissioned dedicated work on recreation and disturbance around Lydney to mitigate the effects of housing growth around the town.

- 1.13 Recreation use of the Estuary has been summarised by McNutt (2023) and visitor surveys (Southgate and Colebourn, 2016; Liley, Panter and Hoskin, 2017; Caals and Liley, 2022) provide further background and context on recreation use, the draw of sites and provide information on the activities undertaken. Clubb and Phillips (2023) give results from an online survey investigating attitudes and awareness of visitors to the Severn Estuary in order to help identify key drivers of recreational behaviour.
- 1.14 Changing recreation patterns, such as the increasing popularity of paddleboarding and an increase in dog ownership (e.g. Morgan *et al.*, 2020), mean predicting future impacts can be challenging. Furthermore, impacts around recreation use have in recent years been exacerbated by climate change (effecting the species distributions, habitats, access patterns etc.) and the Covid pandemic which resulted in an increase in recreation use of local greenspaces and an increase in awareness of the importance of access for well-being and general health (Randler *et al.*, 2020; Natural England and Kantar Public, 2021; Poortinga *et al.*, 2021). Bird flu is also a current concern for a range of waterbirds and has impacted a range of species.
- 1.15 Further background and evidence on recreation impacts for the Severn Estuary can be found in a range of studies. Natural England's site improvement plan¹ for the Severn Estuary SAC/SPA/Ramsar identifies public access/disturbance as a current pressure and a threat and prioritises it above all other pressures or threats identified. The plan states: *"Public access and recreation (including third party activities) may have an impact on bird species sensitive to disturbance, causing displacement from feeding, roosting and moulting areas, and if severe could affect long term survival and population numbers and distributions within the Estuary. There are a wide range of recreational activities within the site (walking, dog walking, horse riding, biking, beach activities, angling, wildfowling, other shooting (eg clay pigeon)) that may cause damage to habitats where pressure is high."*
- 1.16 The marine conservation advice package produced by Natural England and CCW² highlights that bird communities are highly mobile and the activity of different species relates to the tide and a range of other factors, which vary

¹ See the Natural England website:

<https://publications.naturalengland.org.uk/publication/4590676519944192>

² Available from the Natural England website:

<https://publications.naturalengland.org.uk/publication/3184206?category=3212324>

between species. One important factor is the level of disturbance which needs to be maintained at or below levels necessary to provide favourable conditions for birds' feeding and roosting areas. The package goes on to state that management should aim to avoid both damage to the supporting habitats and disturbance to the birds.

- 1.17 Sites that are functionally-linked to the SPA/Ramsar may also be potentially vulnerable to disturbance. Such sites may become more important in the long-term as a result of climate change, sea level rise and increased storminess.
- 1.18 There is also a range of more general literature on recreation and impacts of people and their dogs that provides background and context (Liddle, 1997; Saunders *et al.*, 2000; Lowen *et al.*, 2008; e.g. Harris, 2023).

Need for a strategy

- 1.19 Local Plans set the levels of housing growth and allocate land for development. The cumulative effects of growth around the Severn Estuary pose clear risks for the European site and these are best addressed strategically. By working together, the relevant Local Planning Authorities can ensure the in-combination effects are resolved and the strategy is therefore a solution to the legislative duties placed on the relevant authorities as competent authorities. It unblocks potential HRA issues at the individual development project level where recreation pressure is difficult to mitigate on a piecemeal basis because it relies on a suite of integrated activities.
- 1.20 In addition, the strategy provides a positive response to the challenge of balancing countryside access and nature conservation. There is a legal right of access to much of the shoreline of the Severn Estuary and surrounding countryside, for example through a network of Public Rights of Way. Access to the countryside is crucial to the long-term success of nature conservation projects, for example through enforcing pro-environmental behaviours and inculcating a greater respect for the world around us (Richardson *et al.*, 2016). Access also brings wider benefits to society that include benefits to mental/physical health (Lee and Maheswaran, 2011; Keniger *et al.*, 2013; Olafsdottir *et al.*, 2020) and economic benefits (Sandbrook, 2010; ICF GHK, 2013; Keniger *et al.*, 2013; Stebbings *et al.*, 2020). As such the provision and enhancement of access to the Estuary is important, yet must be balanced with the need to provide the adequate protection for the nature conservation interest.

- 1.21 The strategy will work alongside, and build on, existing work undertaken by a range of organisations around the Estuary. The Severn Estuary Partnership forms the existing Coastal Partnership and the Association of Severn Estuary Relevant Authorities (ASERA)³ has a Management Scheme for the Estuary, conducts awareness raising communications for the site and has Good Practice Guidelines to tackle disturbance. Organisations such as the Wildfowl and Wetlands Trust manage reserves where people can see birds and other wildlife without disturbing them.

³ <https://asera.org.uk/about-asera/>

2. Mitigation measures

- 2.1 The aim of the mitigation is to provide sufficient certainty for the Local Planning Authorities that they have met their duties under the Habitats Regulations and addressed impacts from the additional recreation (associated with new housing) to the Severn Estuary SAC/SPA/Ramsar.
- 2.2 As such the mitigation is not intended to address all recreational impacts (for example relating to existing recreational use). While success would ideally result in thriving bird populations and other qualifying features, it is recognised that other factors (such as climate change) may also be affecting populations (regardless of any recreation impacts). As such successful mitigation will mean a reduction in damaging behaviours (such as dogs off leads disturbing birds) at sensitive locations and a greater awareness among visitors of the nature conservation importance of the site and the impacts associated with their behaviours.
- 2.3 A suite of mitigation measures will provide the most confidence that that adverse effects arising from recreation have been prevented. This is because a combination of measures working together reduces risk and builds in contingency for amending the strategy if some measures do not perform as well as envisaged, once implemented. Other measures can still be functioning in the short term whilst some are revised. An integrated suite of measures delivered together also improves efficiency, which in turn adds to effectiveness with improved value for money.
- 2.4 Mitigation comprises Strategic Access Management and Monitoring (SAMM) and alternative green infrastructure away from the Estuary. These are summarised in Figure 1, which also shows the different elements of SAMM.

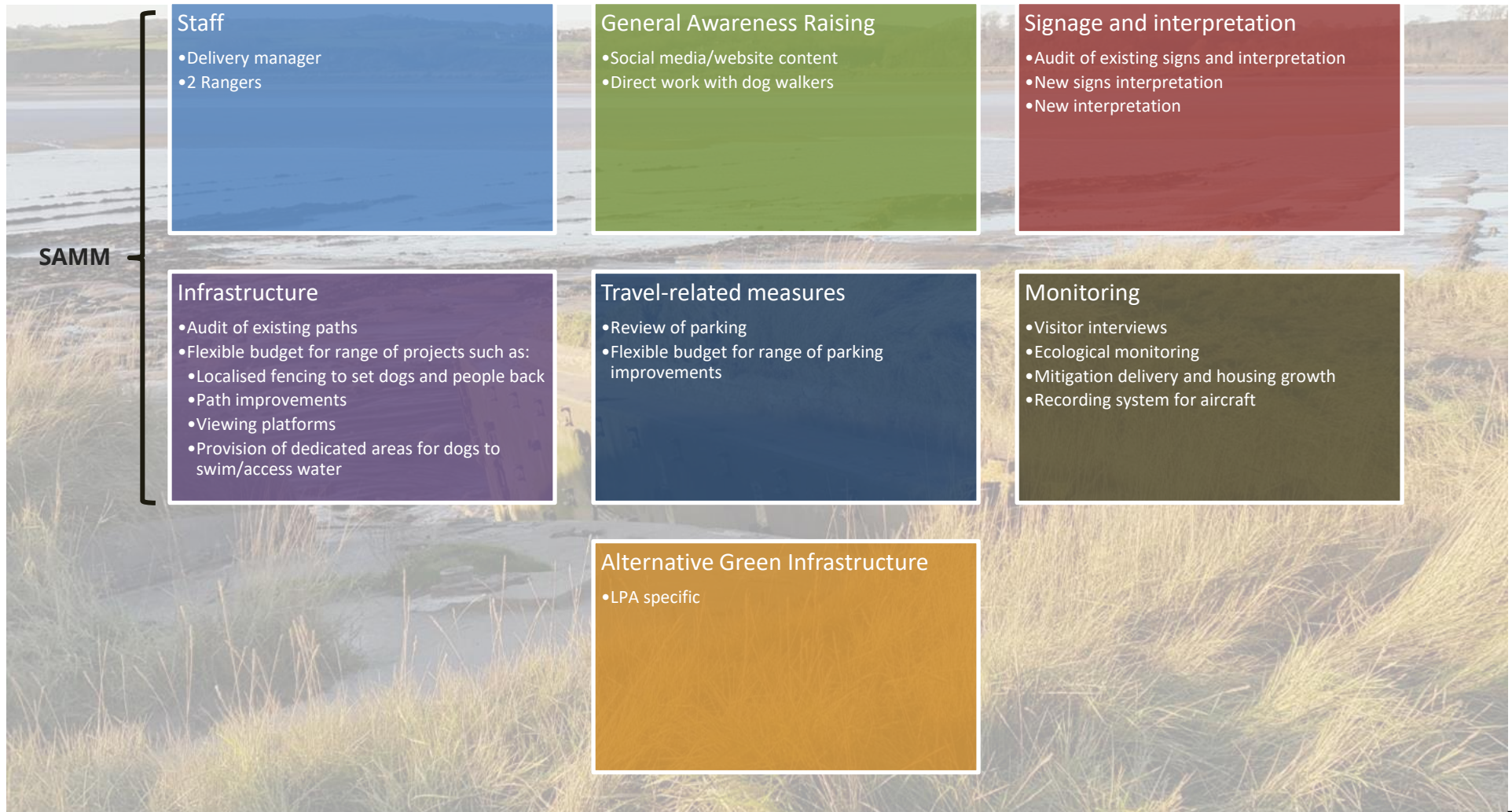


Figure 1: Overview of mitigation strategy components

Strategic Access Management and Monitoring (SAMM)

- 2.5 SAMM include a delivery manager whose role will be to coordinate mitigation, working with partner organisations to ensure effective, joined-up mitigation around the coast, coordinating budgets and reporting. The Delivery Manager will work closely with the ranger team with the scope to manage the rangers and provide some cover (e.g. leave periods, busy days).
- 2.6 A key component of SAMM is face-to-face ranger provision. A mobile ranger team is a key component of other mitigation schemes such as those on the Solent, the South-Devon sites, the Thames Basin Heaths and the Dorset Heaths, where the rangers form a mobile team that spend the majority of their time outside, talking to visitors, influencing how visitors behave and showing people wildlife.
- 2.7 There is a clear role for increased ranger provision around the Estuary and the roles will primarily involve engagement with visitors:
- Reinforce good/responsible behaviour;
 - Explain issues around dogs out of control and target talking to those whose dogs are not under control;
 - Target certain other activities/behaviours including where visitors are flying drones, accessing the water for watersports and locations used by dog walkers;
 - Show people wildlife, highlight the importance of the coast for wildlife and celebrate that richness;
 - Some basic monitoring and recording (e.g. of incidents).
- 2.8 The role of the rangers will also extend beyond face-to-face engagement to work with partners and stakeholders including:
- Working with local cafes, food outlets and other business that may be able to play a role in promoting key messages and raising awareness;
 - Work with local access providers and community groups as relevant;
 - Co-ordination with landowners and organisations working around the coast to ensure consistent messaging and targeting of mitigation delivery;
 - Liaison within the relevant councils (e.g. ensuring joined-up approach re dogs, parking, beach cleaning etc)
- 2.9 The focus for the rangers are likely to change with time, for example extreme weather events and issues relating to access and bird flu require different messaging, communication and have different implications. Ranger

provision will therefore need to be flexible and adjusted to reflect types of development and the mitigation priorities coming forward.

- 2.10 Ranger provision is likely to work best where delivered by a single discrete body where the sole purpose is mitigation delivery. Bird Aware Solent provides a good model in this respect. The team have branding that sets them apart from other council staff/NGOs and as the role is solely around mitigation delivery, staff cannot be diverted towards other duties (such as routine management, maintenance, membership recruitment or other such tasks). One of the advantages of such an approach is that the ranger effort is deployed strategically, ensuring seamless delivery across the coast and also consistent messaging, communication and information. There are cost savings from working at the regional scale. There is scope too to learn and adopt practices from other mitigation schemes, with those on the Solent, South-East Devon, the Dorset Heaths and the Thames Basin Heaths among the longest running.
- 2.11 The strategy includes provision for 2 rangers. The SPA shoreline from the South Gloucestershire boundary near Berkeley to the northern tip near Frampton on Severn and then along to the Severn Bridge in the south-east corner of Forest of Dean is around 56km. Clearly the remit of the rangers will need to extend beyond this in order to extend into South Gloucestershire and also to cover functionally-linked land. The level of ranger provision proposed is therefore more than 26km per ranger. This level of provision accords with other strategies and ensures the potential for on-site coverage at weekends and different times of day (including early morning). Data from the Solent (where a mitigation ranger team has been long established) indicates rangers can speak to around 5-7 groups per hour on-site, depending on how busy the location is (Liley *et al.*, 2023). The ranger team has included around 7 staff over the winter (covering some 250km of coast, i.e. 36km per ranger) and the level of annual growth (around 3400 dwellings), equates to around 30 minutes ranger time per new dwelling per winter. A recent review has flagged the level of provision is low (Liley *et al.*, 2023). The Northumberland Coast mitigation involves 3 rangers for around 110km of coast (37km per ranger) and a relatively low level of housing growth (750 dwellings over the plan period within the zone of influence).
- 2.12 Ranger provision should be reviewed over time and may need to be increased. The 2 posts included in the strategy would be full time (passage/wintering birds are present from the end of July – May) and as the

team is reviewed/grows there could be scope to supplement with seasonal coverage.

- 2.13 The ranger provision is essential and provides a foundation to the strategy. Alongside the ranger team (and dovetailing with their work), the SAMM includes a review of signage and interpretation, new signs and interpretation, social media work and funding for a range of infrastructure projects including paths, boardwalks, fencing and parking related measures etc. These measures all complement the ranger provision by extending the messages, influencing behaviour and directing visitor flows (e.g. away from sensitive areas). The SAMM includes an overall budget that can be directed towards different projects and it will be the role of the delivery manager to work with landowners, rangers and site managers to identify suitable projects and direct funds accordingly. Preliminary discussions have identified opportunities for extending the board walk at Saul Warth and a range of projects at and around Slimbridge.
- 2.14 Other SAMM components include monitoring that extends to visitor surveys and bird surveys alongside WeBS data.
- 2.15 SAMM measures are summarised further in Table 1 and detailed costs and measures are set out in Appendix 2.

S e v e r n E s t u a r y R e c r e a t i o n M i t i g a t i o n S t r a t e g y

Table 1: Detail of SAMM measures. These are also set out in Appendix 2 which gives a breakdown of costs for each measure. Rows could be colour coded to match figure

Type of measure	Mitigation measure	Description	Justification	Notes
Staff	Delivery manager	Full time post with duties covering community liaison, funding, implementation of projects, coordination of measures, reporting to executive group, supporting rangers etc.	Necessary to oversee delivery and coordinate	Project manager post necessary in-perpetuity; initially full-time post and major focus on infrastructure works, in longer term could shift to a part time post with more admin/oversight role
Staff	Ranger time	2 full time posts with duties covering face to face engagement and intercepting visitors where particular issues/impacts (e.g. drones, dogs chasing birds, fires etc.).	Face-face engagement to influence behaviour and raise awareness, can be targeted to specific times, locations etc.	Flexible deployment to cover locations, times of year and times of day where issues
Staff	Ranger resources (vehicles)	2 Vehicles for rangers	Vehicles provide clear visible presence and essential to access areas	Vehicle costs may need to change with time
Signage & Interpretation	Audit of current provision	Undertaken by the delivery officer/rangers with some external support, identifying existing locations, condition, key messages	Audit necessary to identify priority locations and phased plan for new signs and interpretation	
Signage & Interpretation	Graphic design for new interpretation and signs	Commissioned external provider	Good quality graphic design to ensure consistent messaging key	
Signage & Interpretation	New interpretation boards	Production and installation	Interpretation ensures key messages can be communicated on site	Good quality interpretation will help ensure understanding of place, issues, where to go, contacts in emergencies etc. Economies of scale but needs to also be place specific

Severn Estuary Recreation Mitigation Strategy

Type of measure	Mitigation measure	Description	Justification	Notes
Signage & Interpretation	New Signs, waymarking etc.	Production and installation	Signage on the ground important to direct people and communicate when/where particular behaviour relevant	
General Awareness Raising	Social media and website	Creation of website/web content for information on mitigation package work of rangers, monitoring results etc. Links to relevant organisations and feeds.	Web and social media are first places visitors will look for information about where to go and any current news/issues relevant to their visit	Content needs to work across different devices. Material needs to extend reach of rangers and provide guidance for those visiting
General Awareness Raising	Direct work with dog walkers	Suite of work directly with dog walkers, including gazeteer on web of where to walk and a series of events, potentially posters etc in vets and other targeted venues	Budget covers external support and specialists (e.g. dog trainers) for events	
Infrastructure on site or near estuary	Audit of existing paths, including unofficial/informal routes	Audit using visitor survey data, focal groups and site visits to identify routes and identify options to rationalise/improve, directing visitor flows etc.		Will require support and input from rangers and delivery manager. Visitor survey data provides good basis to identify areas to focus. Will also require specialist input as to potential options and indicative costs. Works will be sensitive
Infrastructure on site or near estuary	Path improvements, fencing and other infrastructure projects	Flexible budget to cover boardwalks, new surfacing, waymarking, fencing, viewing platforms and other measures to redistribute access as identified in audit	Quality of paths and how they are maintained will influence where people go and how they move through sites. Fences effective barriers at specific locations to protect sensitive features	
Monitoring	Visitor interviews	Interviews with random sample of visitors, to check on distances travelled, engagement/awareness with mitigation project, routes etc.	Provides data that can then feed into mitigation delivery	

Severn Estuary Recreation Mitigation Strategy

Type of measure	Mitigation measure	Description	Justification	Notes
Monitoring	Ecological	Budget to contribute/fill gaps in existing monitoring, potentially relating to birds (if gaps in WeBS) and functionally linked land	Ecological monitoring important to ensure accurate and upto date communication/engagement material and help to target mitigation	
Monitoring	Online hub for reporting problem behaviour by light aircraft	Creation and promotion of an online hub for the public/site managers to log problem behaviour by aircraft, with data monitored by Delivery Manager/Rangers and used to directly approach relevant flying clubs, airfields etc if and when problems emerge	Disturbance impacts to qualifying bird species/assemblages from light aircraft identified by a range of stakeholders at an issue widely around the Estuary	Aim to achieve a simple system that can document any incidents (ideally with photographs) and allow them to be followed up. Could be extended to other types of recreation as appropriate/necessary
Travel	Review of parking	Review to audit all parking locations on and around the estuary, including functionally-linked land, considering potential for charging to be adjusted (i.e. more expensive at sensitive locations), plus potential for improvements to focus use and activity. Potential to close some parking locations.		
Travel	Parking improvements/modifications	Changes potentially including improvements, resurfacing, rationalising, changes to charging		

Alternative green infrastructure

2.16 Off-site infrastructure will provide access or enhance existing countryside away from the Estuary, with the aim of drawing some visitors and recreation use to alternative destinations. Three different approaches (see Figure 2) are possible and relevant to different types of development or locations.

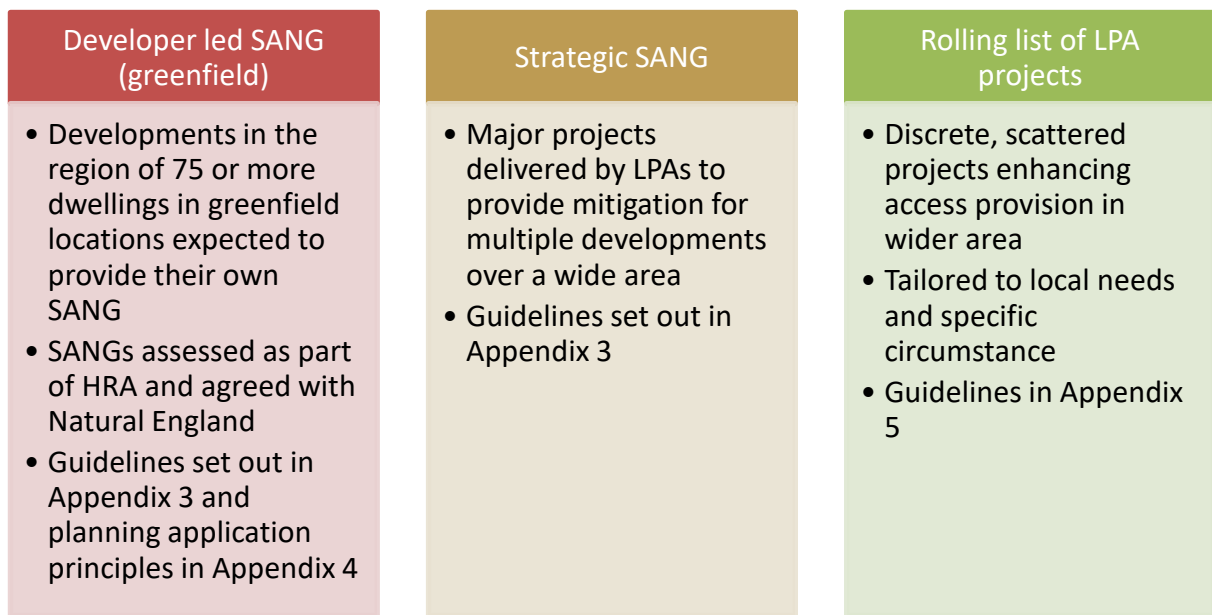


Figure 2: Different off-site infrastructure

2.17 Developer-led SANGs will be delivered directly by developers through on-site provision. Other types of infrastructure will be led by the local planning authority and funded from contributions.

2.18 For large sites coming forward in greenfield locations, provision of SANGs should form part of the overall infrastructure provision of that site. These developer led SANG will be incorporated into the site design from the outset. SANGs provision should be delivered in advance of occupation of dwellings, however for larger proposals mitigation may be structured so as to tie in with development phasing.

2.19 Small sites and brownfield sites within existing built-up areas are unlikely to be able to accommodate the scale of space required for a SANG and would therefore make a contribution through either s106 or CIL towards strategic SANG or, if there is no strategic SANG available at a suitable distance, contribution towards a range of discrete projects enhancing existing access.

- 2.20 Strategic SANG will provide larger destination sites and are likely to be the most effective in drawing alternative recreation use⁴. Such LPA led sites are likely to be better quality greenspaces and provide a different visitor experience to most developer-led greenspace which will be typically be local to large developments.
- 2.21 The rolling list of projects will be produced by each authority, tailored to fit with the local needs for access and demand in the local area, and will fill any remaining mitigation need (alongside Developer-led SANG and Strategic SANG). The rolling list of projects could include measures relating to existing greenspaces and include new footpath links between spaces, improved parking, fenced dog exercise/training areas, improved path infrastructure, better access (road crossings or bridges) etc. Some such projects would be appropriate in the more urban areas where the recreational behaviour of urban residents may differ to those outside the city and there is limited opportunity to create new greenspace. Such projects will also be more appropriate in more rural areas where small levels of growth and windfall come forward in locations where there is no strategic SANG.
- 2.22 Each authority will ensure a list of projects that is agreed with Natural England and updated as needed. The list may well overlap with green infrastructure strategies but will be separate and clearly identified as mitigation. Costs and relevant levels of contribution will be determined by each authority.
- 2.23 These different options provide a tiered approach to off-site infrastructure and over time will ensure robust mitigation by increasing the quality and availability of accessible natural greenspace outside European sites. The different options will mean a range of infrastructure is available to local residents, including destination sites with car parks and a range of facilities to more local and small-scale provision. The aim should be to deliver a network of inspiring greenspace that delivers the necessary mitigation and as appropriate fulfils a range of other functions such as climate change resilience, reduced need for car travel, nature recovery and health benefits.

⁴ Examples from other parts of the country that demonstrate the success of SANG in deflecting access away from estuary/coastal sites include Dawlish Countryside Park; see Caals et al. (2022) for details.

3. Strategy implementation

Overview

3.1 This section sets out the details of the strategy in terms of the geographic scope, types of development, costs and governance.

Zone of Influence

3.2 Home postcodes of interviewees from the visitor survey (Caals and Liley, 2022) are shown in Map 1 – these postcodes are for those people interviewed at the estuary survey points only (see Caals & Liley 2022 for background and discussion). The zone of influence drawn from these data is also shown. It broadly reflects a distance of 12.6km from the SPA/SAC/Ramsar boundary, and this distance reflects the 75th percentile of the distances from home postcode to interview location (just for those interviewed at the estuary survey points). The use of the 75th percentile has become the standard and reflects the approach used in other mitigation strategies around the country (see Liley, Panter and Chapman, 2021)⁵. The use of the 75th percentile ensures a zone that encompasses the area where most visitors originate yet excludes some of the areas where people travel large distances and are visiting only very occasionally.

3.3 In the case of the Severn Estuary, the 12.6km has been clipped slightly to exclude the very small area of Cotswold District that lies within 12km; this is for practical reasons as the area concerned is so small and is rural, meaning very little (if any) housing growth is likely. As such the strategy solely applies to the following local planning authorities:

- Forest of Dean District Council
- Gloucester City Council
- Stroud District
- Tewkesbury Borough Council

3.4 Contribution to the strategic mitigation scheme from development proposals within the zone of influence should enable applicants to secure the

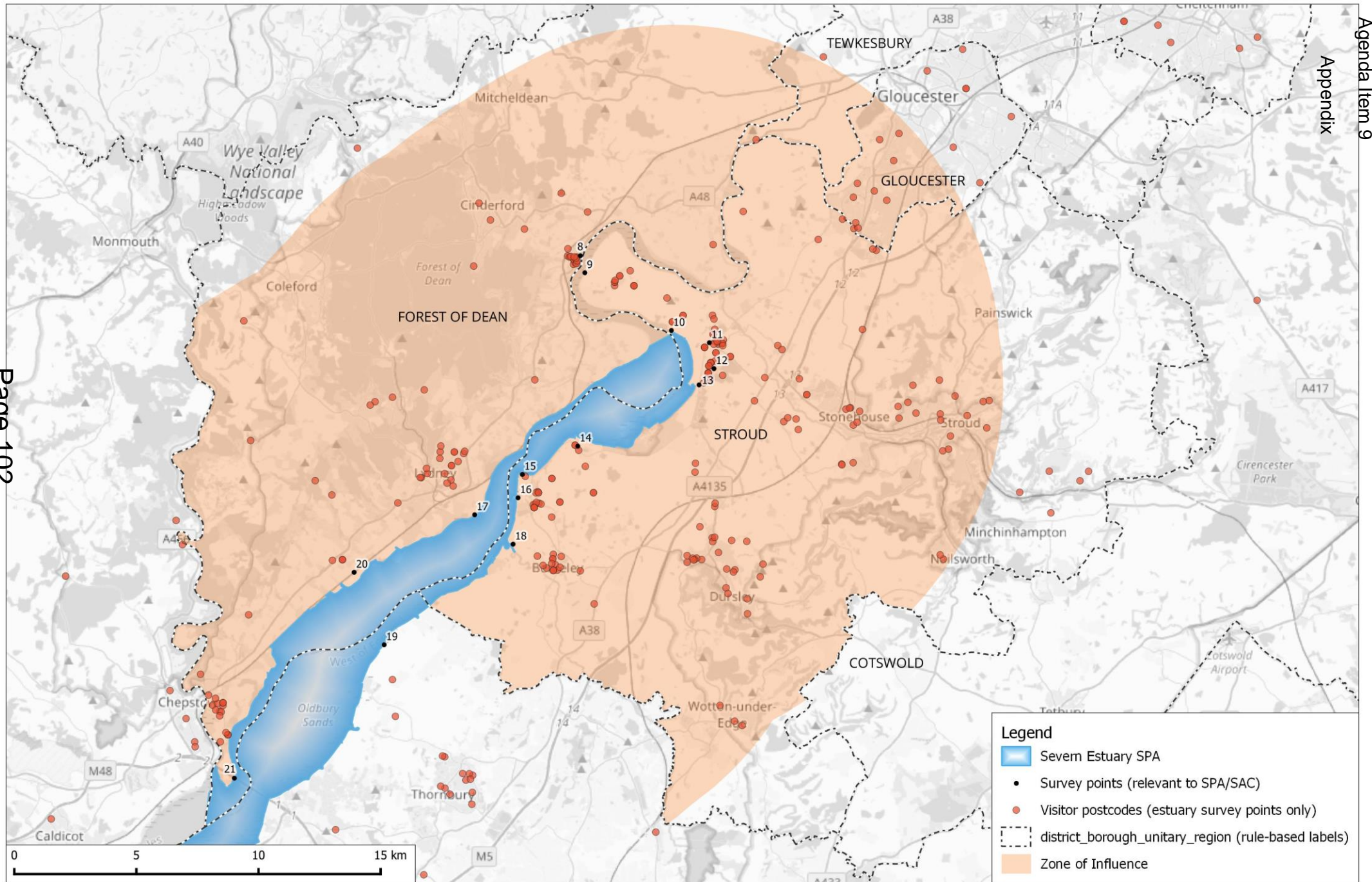
⁵ See also appeal decision APP/X0415/W/22/3308630, Millen Homes Ltd against Buckinghamshire Council, published October 2023.

<https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=54374907>

appropriate avoidance or mitigation measures and enable the relevant Council to conclude, through appropriate assessment, that there is no adverse effect on the integrity on the Severn Estuary SAC/SPA/Ramsar from recreation. It should however be noted that the zone of influence has been drawn to the SPA/SAC/Ramsar boundary and has not been extended to further buffer functionally-linked land. SMM mitigation measures will extend to include functionally-linked land and SANG will work to deflect access away from any sensitive site, including any functionally-linked land. However, where development may result in additional increase in recreation use to functionally-linked land, particularly if the development location is very close or large, there may need to be additional consideration or checks to ensure risks are adequately addressed, and these checks may still be necessary beyond the zone of influence.

- 3.5 Where an application site spans the zone of influence then all units that fall partly or wholly within the relevant zone will need to secure mitigation.
- 3.6 For large development just outside the outer zone, it will not necessarily be the case that likely significant effects from recreation and the Sefton Coast can be ruled out. For these sites there is scope to contribute towards the strategic mitigation and this will need to be assessed on a case-by-case basis.

Map 1: Zone of influence and visitor survey postcodes



Types of development

3.7 The strategy relates to residential development (including affordable housing) and some other types of use including some tourist-related development, as summarised in Table 2 and that come forward within the zone of influence.

Table 2: Types of development relevant to the strategy

Use Type/Class	Likely Significant Effect	Mitigation requirements
Dwelling houses (C3) Any net increase	Yes	Per dwelling contribution
Dwelling houses (C3) Extension or 'Granny' Annex	Possibly, case-by-case decision and depends on whether functions as a separate unit	Per dwelling contribution if necessary
Dwelling houses (C3) Replacement dwelling	No	
Residential Institutions (C2/C2A) Accommodation and care to people in need of care including nursing homes, hospitals and secure institutions	Possibly, case-by-case decision and depends on the type of scheme and level of mobility of residents	Per unit contribution if necessary
Residential Institutions (C2/C2A) School, college or training centre	No	
Hotel (C1) Including boarding houses and guest houses	Possibly, case-by-case decision depending on potential to rule out tourists visiting the coast	Per unit contribution if necessary
Houses in Multiple Occupation (C4/Sui Generis) Including managed student accommodation	Yes	Per dwelling contribution
Holiday Dwellings (Sui Generis)	Possibly, case-by-case decision depending on potential to rule out tourists visiting the coast	Per unit contribution if necessary
Gypsy and Traveller Pitches and residential moorings for barges or boats (Sui Generis) Net new pitches/moorings that are either temporary or permanent	Yes	Per dwelling contribution
Café, food outlet or visitor attraction	Possibly, case-by-case decision based on application, location and links to coast	Contribution decided on a case-by-case basis as relevant

Tourist development

3.8 Holiday dwellings and other tourist accommodation are included in Table 2. Visitor survey data (Caals and Liley, 2022) shows that holiday-makers make

up a relatively small proportion of the overall levels of use. Holiday makers accounted for 5% of those interviewed, with a further 1% of interviewees comprising those staying away from home with friends or family.

- 3.9 Clearly some tourism related development will be closely linked to the estuary, for example sites with direct shoreline access, watersports facilities etc. Other tourism related development will be focussed around culture and heritage and have no impacts on the Severn Estuary SAC/SPA/Ramsar, while some development may relate to a mix of uses. Assessment can only be undertaken on a case-by-case basis with the option to contribute towards the strategic mitigation as necessary. Any contribution should be on a per unit basis, with the option (if suitable data are available) to adjust based on occupancy rates.

Growth to be mitigated

- 3.10 Levels of housing growth requiring mitigation and over the period 2024-2041 are approximately 16,488, based on information provided by the relevant planning authorities. The figures are estimates only:
- Gloucester City:1364;
 - Forest of Dean: 3730;
 - Stroud:11000 (this includes 3000 dwellings at Whaddon relating to the unmet housing need in Gloucester);
 - Tewkesbury: 394.

Costs per dwelling

- 3.11 SAMM costs total £8,605,850 (see Appendix 2), this includes a 10% contingency sum to allow for uncertainty around housing numbers and variability in the costs of measures included within the SAMM. The per dwelling contribution is therefore: £521.95.
- 3.12 The costs may be further adjusted to reflect any underspend from previous years/carry-over from the previous strategy and also to allow for administration costs. Costs will be adjusted on an annual basis to reflect inflation.
- 3.13 SANG costs will be additional to the SAMM and some development will not need to make a SANG contribution as the developer will provide the SANG provision. Costs for SANG (where required) will be specified by the relevant local authority.

Legal mechanism to secure developer contributions

- 3.14 Measures are set out within this strategy and established strategically to ensure they can be delivered and are effective. The option remains for individual developers to provide suitable mitigation through a different approach. Any such cases will need to provide detailed evidence (through a shadow HRA, agreed with Natural England) to support any different measures proposed and rule out adverse effects on the integrity of the Cotswold Beechwoods SAC.
- 3.15 Developer contributions will be secured within the S106 legal agreement or unilateral undertaking accompanying the planning permission. The legal requirement will be for the payment of the required funds on commencement of development. Providing the funds on the commencement of development ensures that the funding is aligned with mitigation delivery.

Overlaps with other strategic mitigation schemes

- 3.16 There are strategic mitigation schemes in place or being developed for other European sites and in some areas the zones of influence will overlap. Of particular relevance are:
- Rodborough Common SAC: updated strategy (2022) includes a 3.9km zone of influence;
 - North Meadow and Clattinger Farm SAC: interim strategy has a zone of 8km;
 - Cotswold Beechwoods SAC: 15.4km zone of influence.
- 3.17 Where zones for other strategies overlap with the Severn Estuary zone, it will be necessary to ensure mitigation for all relevant European sites and SANG contributions will therefore be necessary for each European site. Depending on the SANG requirements in each strategy, multiple SANG payments may not be necessary. As such, contributions towards SANG or the provision of SANG at the standard rate (8ha per 1000 new residents, see Appendix 3) will work as mitigation for multiple European sites. There is synergy in particular with the Cotswold Beechwoods Strategy and SANG contributions should be standardised across for both strategies.

Governance

- 3.18 There is uncertainty as to how mitigation priorities might need to change in the future, and such uncertainty can only be addressed through good monitoring, adaptive mitigation and regular review. It will be important that there is flexibility as to how money is spent and when so that mitigation delivery reflects housing growth coming forward and the priorities at the time.
- 3.19 Certain elements within the mitigation package have the scope to adapt and flex as conditions and priorities change, for example ranger time. There is a flexible budget within the SAMM to fund infrastructure projects and it will be possible for organisations to approach the delivery manager directly to develop projects and request funds. Furthermore, it is possible that additional opportunities may arise, for example as a result of changing land ownership. It is important therefore that the governance is flexible and responsive enough to enable developer contributions to be shifted to different components of the strategy easily. Annual reviews of budgets and the ability to adjust finances as appropriate (with rapid approval) will be key.
- 3.20 This will work through the Delivery Manager who will oversee the budget, undertake reviews and work closely with partners around the estuary. The Delivery Manager will need to liaise with planners and existing bodies such as the Severn Estuary Partnership and ASERA as well as all local conservation bodies and land managers/owners.
- 3.21 As Figure 3 shows, the Delivery Manager will report to the Oversight Group who will sign off budgets, authorise spend and have a strategic overview. This will ensure the Delivery Manager can then work directly with partners to deliver projects on the ground. The Oversight Group will comprise representatives from each authority, as well as the Combined Authority and Natural England and will meet quarterly.
- 3.22 The Working Group will be a more informal group that includes delivery partners. The role of this group will be to come together to support the Delivery Manager and provide the opportunity where practical issues around mitigation delivery can be resolved. Issues such as enforcement, deflection of issues from one location to another, anti-social behaviour, promotion of sites and changes in management at specific locations will all be relevant to this group. If rangers are hosted by different organisations, this group will ensure consistency of approach, for example that there are no spatial gaps

in coverage and messages are consistent. Survey data and monitoring results can be shared and used to refine approaches.

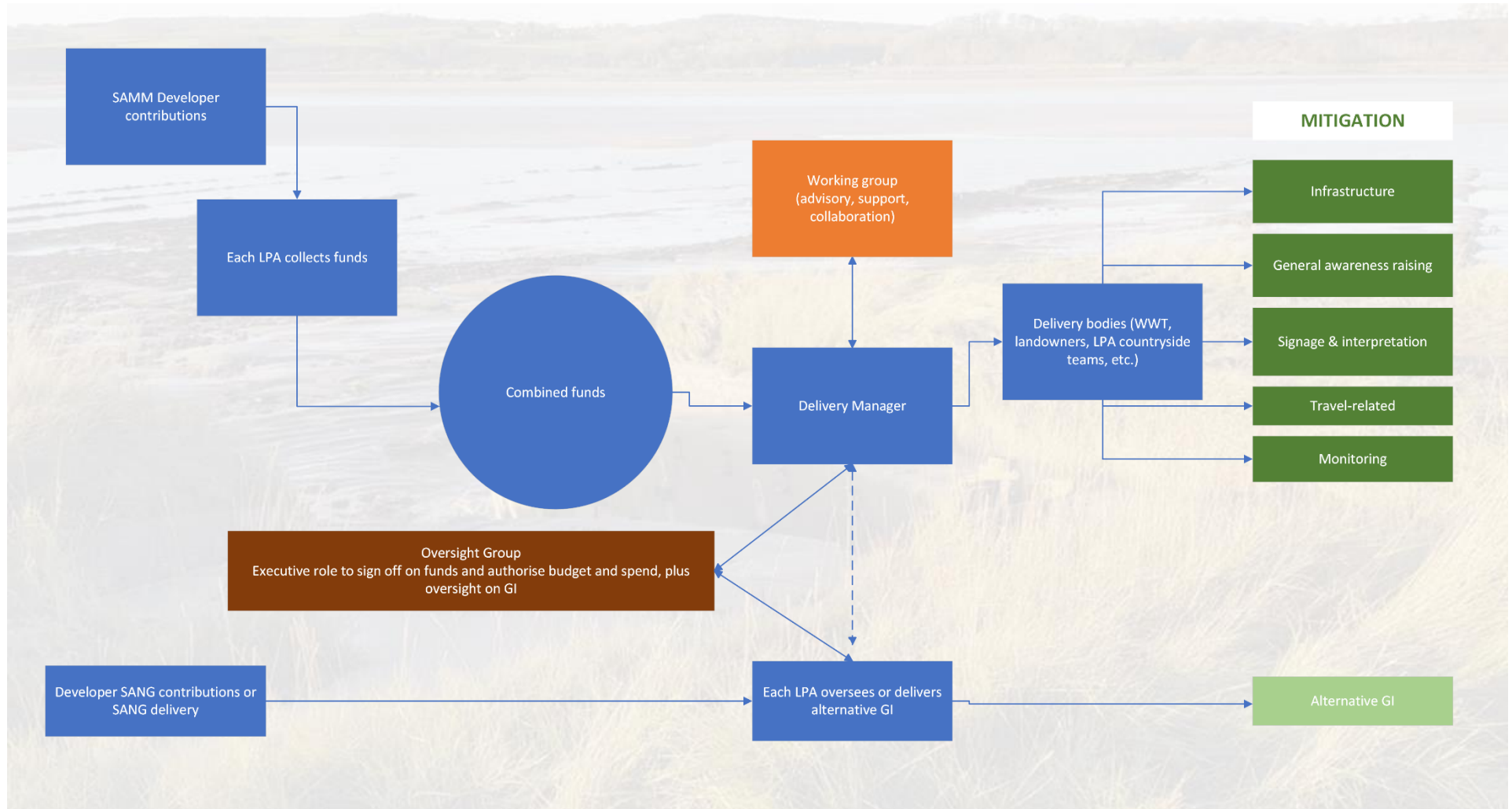


Figure 3: Governance structure

Review and phasing of measures

- 3.23 This strategy covers the period through until 2041 in terms of how the level of contributions have been set. The strategy should be reviewed and updated on at least a 5-year basis (alongside annual reviews of budget and measures to be funded).
- 3.24 Mitigation needs to be effective in the long-term, lasting as long as necessary to address any impacts. It is however difficult to predict how access patterns will change in the long-term, and issues and priorities for mitigation may change. Costs have been derived assuming that mitigation will be delivered in-perpetuity⁶. Implementation of measures will be phased with housing growth, ensuring sufficient mitigation is in place before new housing is occupied. This means not all measures will be instigated at once. Some measures will be one-off or short-term in nature.
- 3.25 Authorising budgets will be a critical role for the oversight group, as there will need to be decisions relating to setting aside money to fund long-term mitigation as opposed to implementing mitigation in the short term and priorities for delivery. The oversight group and ability for delivery bodies to bid for money will ensure funds are directed as required to ensure mitigation is effective and a 10% contingency is included, to allow for unforeseen changes to costings and provide flexibility in the funds available and how money is prioritised.

⁶ In line with other mitigation strategies this assumed to be 80 years.

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Appendix 1: Background to SAC,SPA and Ramsar features

The table below summarises the relevant European sites included in this strategy. Links in the first column are to the Natural England website and the relevant conservation objectives (SPAs and SACs) and for Ramsar, the Ramsar citation. # indicates species/habitats where the UK has a special responsibility. Descriptive text is largely drawn from Natural England’s relevant site improvement plan and from the supplementary conservation advice on the Natural England website.

European site	Qualifying Features	Description
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 114</p> <p>Severn Estuary SAC</p>	<p>H1170 Reefs H1130 Estuaries H1140 Mudflats and sandflats not covered by seawater at low tide H1110 Sandbanks which are slightly covered by sea water all the time S1099 <i>Lampetra fluviatilis</i>: River Lamprey S1095 <i>Petromyzon marinus</i>: Sea Lamprey S1103 <i>Alosa fallax</i>: Twait Shad H1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>)</p>	<p>The Severn Estuary is located between Wales and England in south-west Britain. It is a large estuary with extensive intertidal mud-flats and sand-flats, rocky platforms and islands. Saltmarsh fringes the coast backed by grazing marsh with freshwater ditches and occasional brackish ditches. The subtidal seabed is rock and gravel with subtidal sandbanks. The site also supports reefs of the tube forming worm <i>Sabellaria alveolata</i>.</p> <p>The estuary's classic funnel shape, unique in the UK, is a factor causing the Severn to have one of the highest tidal ranges in the world. A consequence of the large tidal range is an extensive intertidal zone, one of the largest in the UK. The tidal regime results in plant and animal communities typical of the extreme physical conditions of liquid mud and tide-swept sand and rock. The species-poor intertidal invertebrate community includes high densities of ragworms, lugworms and other invertebrates forming an important food source for passage and wintering waders and fish. The site is of importance during the spring and autumn migration periods for waders, as well as in winter for large numbers of waterbirds, especially swans, ducks and waders.</p>
<p>Severn Estuary SPA</p>	<p>Waterbird assemblage A394(NB) <i>Anser albifrons albifrons</i>: Greater White-fronted Goose A037(NB) <i>Cygnus columbianus bewickii</i>: Bewick Swan A048(NB) <i>Tadorna tadorna</i>: Common Shelduck</p>	<p>As above</p>

Severn Estuary Recreation Mitigation Strategy

	<p>A051(NB) <i>Anas strepera</i>: Gadwall A149(NB) <i>Calidris alpina alpina</i>: Dunlin A162(NB) <i>Tringa totanus</i>: Common Redshank</p>	
<p>Severn Estuary Ramsar</p>	<p>The Ramsar listing is for a number of criteria relating to estuarine habitat communities and migratory fish (Salmon <i>Salmo salar</i>, Sea Trout <i>S. trutta</i>, Sea Lamprey <i>Petromyzon marinus</i>, River Lamprey <i>Lampetra fluviatilis</i>, Allis Shad <i>Alosa alosa</i>, Twaite Shad <i>A. fallax</i>, and Eel <i>Anguilla anguilla</i>) in addition to the extensive waterfowl assemblage.</p>	<p>As above</p>

Appendix 2: SAMM mitigation costs

The table below matches the structure in Table 1 in the main body of the strategy (which see for detailed descriptions of the measures) and here the broad costs for each are set out. Costs are calculated to cover costs in the long term, with some measures involving implementation over many years (up to 80 years in total). In the timing column 1=initial priority, 2=medium term or measures that could be phased. The total cost of the measures in the table is £7,823,500. With a 10% contingency this gives a total of £8,605,650.

Type of measure	Mitigation measure	Timing	One-off/Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
Staff	Delivery manager	1		£63,700	25	£1,592,500	£42,000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £7000 per annum support costs. Costed for 25 years to cover plan period and beyond.
Staff	Ranger time	1		£82,900	50	£4,145,000	2 fte equivalent posts with costs extended to cover 50 years. £27,000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs. Some ranger provision potentially required in-perpetuity however team can shrink over time as SANGs and infrastructure changes become relevant. 50 years for 2 posts gives potential for regular review and potential for it to shrink or expand (in short term) as priorities require and ensure in perpetuity coverage.
Staff	Ranger resources (vehicles)	1		£9,950	50	£497,500	£32,000 EV purchase, replaced every 10 years, £1500 for livery, £2000 p.a. insurance, 5000 miles p.a. at 0.25p per mile electricity. Assumed to be rolling

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Type of measure	Mitigation measure	Timing	One-off/Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
							annual cost for 2 vehicles. Timed to match ranger coverage.
Signage & Interpretation	Audit of current provision	1	£1,000			£1,000	Small budget for expenses, resources if needed etc.
Signage & Interpretation	Graphic design for new interpretation and signs	2	£15,000			£15,000	£15,000 for design of new interpretation with different designs; may need to allow for refresh/update of design.
Signage & Interpretation	New interpretation boards	2	£75,000			£75,000	£2,500 per board for production of timber frame and graphic panel, delivery and installation. Estimate of 15 boards. Costs allowed for 1 X replacement therefore 30 total
Signage & Interpretation	New Signs, waymarking etc.	2	£72,500			£72,500	Cost based on 100 posts at £350 per post to cover production, delivery and installation. Treated softwood marker posts, 1.6m high with slanting top and coloured band or marking incorporated. Costs allowed for 1 X replacement within plan period, therefore 200 total. Additional £2500 for waymarking discs or signs made of glass reinforced plastic for longevity (£2000 allows for 2 sets of discs - 2 designs, 500 of each).
General Awareness Raising	Social media and website	2	£20,000	£2,500	80	£220,000	Budget cover initial website production and hosting fee/updates in-perpetuity, including some costs for support/help with social media content

Severn Estuary Recreation Mitigation Strategy

Type of measure	Mitigation measure	Timing	One-off/Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
General Awareness Raising	Direct work with dog walkers	2	£15,000	£2,500	20	£65,000	Budget flexible, but assumes around £15k for website and content creation. Remaining sums spread over different years providing money for events, specialist consultancy support (e.g. running dog training sessions) etc as required. 20 years to cover plan period and beyond. Not required in perpetuity as assumption that once marked shift in behaviour achieved, this is then sustainable in the long term.
Infrastructure on site or near estuary	Audit of existing paths, including unofficial/informal routes	1	£20,000			£20,000	Budget to allow external commission.
Infrastructure on site or near estuary	Path improvements, fencing and other infrastructure projects	2		£20,000	20	£400,000	Flexible budget to allow infrastructure to be updated/enhanced etc. Dependent on path audit results and costs to be reviewed once audit complete. 20 year time period allows for renewal and changes over extended period. Need for in-perpetuity costs to be checked as part of audit
Monitoring	Visitor interviews	2		£25,000	3	£75,000	Budget allows for 3 surveys at £25,000 each. Surveys to be timed as relevant to inform updates to strategy/plan review etc
Monitoring	Ecological	1		£10,000	20	£200,000	Flexible budget, spread over extended period and providing funds for ecological survey work as required
Monitoring	#REF!	2	£5,000	£1,000	15	£20,000	Estimated cost to establish and run some kind of reporting system

Appendix

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Type of measure	Mitigation measure	Timing	One-off/Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
Travel	Review of parking	1	£25,000			£25,000	One-off cost for consultancy report, all car-parks visited, mapped and assessed and strategic review to consider potential changes
Travel	Parking improvements/modifications	2	£400,000			£400,000	Flexible budget to deliver measures identified in parking audit (and at this stage indicative costs to be updated following audit), with potential for costs to be used in conjunction with revenue collected for parking charges. Costs could be targeted towards small number of parking locations or be spread for smaller changes across more car-parks.

Appendix 3: Suitable Accessible Natural Greenspace (SANGs) guidelines

The role of SANGs is to provide an alternative destination to those visitors who would otherwise visit the Severn Estuary. SANGs provision will be tailored to each authority and the geographic area, reflecting the variation across the different authorities. SANGs will be most effective if targeted to those visitors who have a big impact, such as dog walkers.

The effectiveness of SANGs will also depend very much on the design and location, these need to work such that the SANGs has a draw equal or greater than the European sites. In these guidelines we set out design and selection criteria for SANGs, drawing on that produced for other areas such as the Dorset Heaths (Dorset Council and BCP Council, 2020) or the Thames Basin Heaths (anon, 2021). The guidelines do not address or preclude other functions of green space, such as biodiversity net gain. Other functions may be provided within SANGs as long as these do not conflict with the specific function of mitigation.

SANGs may be created from:

- Existing open space of suitable size and quality, with no existing or limited public access. Such sites would be 'opened' for public access and promoted as such.
- Land in other uses, such as golf courses, which could be converted into SANGs.

Access on the relevant European Sites

Visitor surveys on the Severn Estuary have involved interviews with a random sample of visitors (Caals and Liley, 2022) and provide context for SANGs design. Dog walking is clearly a target group to focus on (dog walking was the main activity for 49% of those interviewed). Visits are typically short (64% of interviewees were visiting for less than an hour) and interviewees tended to visit frequently (half of interviewees visited at least once a week). The majority of interviewees (63%) travelled by car and the key factor influencing their choice of location was the proximity to home (36%). Median route length (i.e. length of walk/cycle/jog, all activities combined) was 2.3km. Home postcode data showed a median distance (postcode to survey point) of 4.1km with and three-quarters lived within 11.3km. Taking the estuary survey points only, three-quarters lived within 12.6km.

Attributes of SANGs

In order to have confidence that greenspace is of a suitable size and quality the following attributes will need to be met:

- SANG should be provided at a target rate of 8ha per 1000 new residents; this per ha standard is equivalent to 0.0192ha per dwelling (assuming an occupancy rate of 2.4 people per dwelling) and it is a widely used standard, originally applied on the Thames Basin Heaths (Burley, 2007) and used by Natural England and a suite of local authorities across the country.
- Sites with sports grounds, playing fields or children's play areas are unlikely to meet the criteria for SANG or if such features are present they should not be counted towards the per ha standard.
- Where sites have existing visitor use, this existing use will need to be taken into account when applying the per ha standard. This will require visitor survey data to be available. Sites are likely to have additional capacity where average visitor use is less than 1 person per ha per hour⁷. Where existing sites are already well used, there will be a need to demonstrate that the measures will be effective, and this may require some delivery upfront.
- SANGs should be established and accessible ahead of occupancy of the development they are supposed to mitigate. On large sites phasing of SANG delivery alongside housing may be possible, but this should be carefully planned to ensure the SANGs can function effectively from the outset.
- The focus for the SANGs should be large sites of at least 40ha (which will accommodate suitably long routes), however smaller sites may work, depending on the location and quality.
- SANGs should provide parking that is free or significantly cheaper than parking at the European sites.
- A guide to parking provision should be in the region of 1.5-2 spaces provided per ha of SANG⁸.
- SANG should have a sense of space, openness and provide viable alternatives to the European sites.
- They should contain a variety of habitats and be scenic, ideally with views.
- They should provide attractive, informal areas for dog walking: a range of walk lengths on relatively dry terrain, including some of at least 3km where dogs can be safely off the lead during the walk.
- They should provide routes that attract walkers, potentially including families. Walks are likely to need to be circuits with some interest (such as viewpoints, heritage features etc.).

⁷ This provides a guide or approximate benchmark, typically busier than the relevant European sites but less than an urban park (see Liley, Panter and Rawlings, 2015). Sites will need to be considered on a case-case basis.

⁸ This figure will depend on how close the SANG is to housing and the proportion of visitors that might arrive on foot or by bicycle and is intended as a guide only

- The site(s) should provide access all year round, without paths becoming waterlogged or inaccessible due to wet or muddy terrain.
- They should provide routes that work for cycling, potentially accommodating family cycling groups and mountain bikes as a low-key destination.
- Access points to the SANG(s) should be primarily within a 5km radius or 10 minute drive and easily accessible by road from the development. Some direct foot access and good access routes for cyclists would be ideal. Direct access on foot would mean some SANG provision within around 500m radius of proposed housing locations.
- New SANGs should be recognisable as a 'destination' such that sporadic visitors are drawn from a wide area and such that the site also attracts more regular (at least weekly) visitors. As such they will need to be positively promoted and welcoming.
- On-site infrastructure can include the following as appropriate:
 - Small scale visitor centre/shelter (not necessarily staffed);
 - Interpretation (providing information about the area);
 - Wayfinding infrastructure to direct people around the site;
 - Some surfaced paths/boardwalks;
 - Wildlife viewing facilities (such as screens);
 - Range of paths (some waymarked) that provide a range of different routes and circuits, potentially including some longer routes for cycling (perhaps family groups and relatively low-key mountain bike circuits) but not such that other access (e.g. appeal to dog walkers) is compromised;
 - Access to water for dogs to drink, bathe and splash in;
 - Benches/informal seating;
 - Viewpoints;
 - Natural Play (particularly for larger, strategic SANG);
 - Catering facilities (particularly for larger, strategic SANG).
- SANGs will need to be promoted through a range of different ways, including signage, so that they are easy to find and local residents (both new and existing) are well aware of the site.
- SANGs will need to provide access in perpetuity, and therefore require some legal mechanism to ensure this.
- Sites with significant nature conservation interest (SSSI) or particularly vulnerable species present are unlikely to be suitable as SANG.

Appendix 4: SANGs planning application principles (where SANG delivery is developer-led)

The following principles are adapted from the advice issued in Dorset (Dorset Council and BCP Council, 2020), with changes to reflect the local circumstance. The principles summarise the details that will be required by Natural England and the Local Planning Authority (LPA) at the time at which a proposal is considered, this may be either at outline or a full application where outline has not been submitted. Natural England will need to advise the authority that full details of the mitigation proposed are considered and secured:

- 1) SANG maintenance and function should be secured and demonstrated to be in place for perpetuity (effectively the development needs to maintain a level of mitigation for the duration of any impact, extending to at least 80 years).
- 2) Applications for developments requiring a SANG are likely to require a Change of Use application for the SANG itself. This may be done through a separate planning application.
- 3) When the Local Authority considers the application for the development that the SANG is designed to mitigate, it will need to be certain that the SANG:
 - meets the SANG criteria;
 - is deliverable, i.e. ownership and appropriate management is secured;
 - can be managed in a suitable condition in perpetuity;
 - will be monitored for the first 5 years.

This typically involves a draft Section 106 agreement, an implementation plan, long-term management plan and monitoring arrangements being submitted for agreement with Natural England and the LPA.

- 4) Where the application for development is at an outline stage the applicant will need to provide sufficient information on the SANG to allow the SANG proposal to be considered.
- 5) The SANG land will have been assessed for its biodiversity features and the applicant will have confirmed that the proposal will not in principle lead to net harm to biodiversity. Where harm to biodiversity features is predicted then the capacity of the SANG will need to be adjusted.
- 6) A full SANG Management Plan will be required as part of a reserved matters application if not previously provided at outline stage. This will set out the implementation and maintenance of the SANG – it will record initial infrastructure (photographically) and management objectives by compartment. This will allow for future evolution of the SANG within the broad SANG criteria rather than a rigid approach.

- 7) If part or all of the SANG is already accessible to the public a visitor survey will need to be submitted as part of the application (outline or full where no-outline is submitted), and the SANG capacity discounted if necessary
- 8) Where a SANG is not co-located with a proposal Natural England will provide advice to the applicant concerning the SANG capacity/catchment on a case by case basis. Guidance is available from the Thames Basin Heaths mitigation approach.

Natural England will provide written confirmation to the relevant authority that the proposed measures (SANG, SAMM) are appropriate to secure the necessary avoidance and mitigation measures and have been secured for a duration proportionate to the timescale of the development's effects.

SANG Visitor Monitoring

Large developments may come forward in phases, monitoring should commence prior to first occupation where there is existing SANG use. It need not be when the land has no existing public access. Monitoring should be phased at two/three years after each substantive phase and also at five years after the development is completed. It may be the case that monitoring will need to include nearby European sites. The primary aims of visitor monitoring are to inform the SANG delivery and allow for adjustments as well as demonstrating the SANGs functionality and use by existing local residents. Effective monitoring will provide a robust baseline which can be observed in future strategic monitoring events.

From 5 years after the final phase of a development future SANG monitoring can be incorporated into the ongoing SAMM programme on a strategic basis. SANG monitoring methodology may include visitor questionnaires, remote sensors and observational studies.

Strategic Access Management and Monitoring (SAMM)

SANGs are not intended to avoid all new residents accessing the protected sites, rather to enable a neutral level of visitor pressure with an equal proportion of existing European site visitors users being diverted. It is therefore necessary, as established in the Thames Basin Heaths area and Dorset, for applicants to secure SAMM relative to the level of residential development. As for SANGs, the mitigation needs to be secured in perpetuity.

Appendix 5: Guidance for other off-site infrastructure projects

For small developments where there are no options for strategic SANG (and developments in more urban areas where there is limited space and opportunities for new SANG) other infrastructure projects will be delivered by the LPA. These could include (but are not limited to):

- New footpath links, potentially joining up areas of existing space to make longer routes possible;
- Increases to the parking capacity or improvements to parking at existing sites;
- Dedicated facilities for dogs, such as fenced exercise areas, dog training areas etc;
- Improved access within greenspace sites – such as boardwalks, better paths, improved drainage etc to open up areas previously under-used or inaccessible;
- Better access to sites, such as road crossings, bridges, access routes etc.;
- Better promotion of existing sites, highlighting where new works or facilities have been undertaken (e.g. through events, gazetteers, road signs etc.);
- Making sites feel more safe and welcoming, for example by addressing anti-social behaviour, litter, dog mess or other issues.

Each LPA will maintain a rolling list of projects that will provide sufficient mitigation for the growth coming forward. Projects that are included on the list will need to have sufficient housing growth within a suitable catchment to ensure they can be funded and delivery may need to be phased to ensure mitigation in line with local housing growth. The list could include projects within a green infrastructure strategy and ideas for projects could be generated from parish councils, community groups, NGOs and other suitable delivery bodies.

Each project will have an estimated uplift in terms of increased recreational use it will achieve, expressed as additional person visits per day. This uplift can then be used to determine the number of houses it might mitigate or the equivalent area of SANG (as per Table 3).

Table 3: Potential mitigation provided by different levels of uplift.

Uplift categories	Approx target value for additional person visits per day	Houses worth of mitigation*	SANG equivalent (ha)**
Negligible uplift	1	4.3	0.1
Low uplift	2.5	10.9	0.2
Moderate uplift	12.5	54.3	1

Appendix A - Estuary Recreation Mitigation Strategy

High uplift	50	218	4.2
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* Calculated on the basis that of 8ha SANG would provide for 1000 new residents (416.7 dwellings at 2.4 occupancy). A typical, fairly well used SANG might provide access at a level of 1 person per ha per hour (before it became too crowded) and therefore 1ha would provide mitigation for 96 person visits per day (8 person visits per ha per hour over a 12 hour day). A visit rate of 0.23 people per day could therefore be anticipated as a level of mitigation equivalent to a single dwelling. A visit rate of 0.23 people per day could therefore be anticipated as a level of mitigation equivalent to a single dwelling.

** Based on the figure in the previous column and 8ha per 1000 residents (or 416.7 dwellings at 2.4 occupancy).

Each project will also need to have a clearly defined catchment, which could be defined by visitor data for the site (if available/relevant) or the following general guidelines:

- 400m catchment: projects that deliver access on sites with very limited or no parking, typically very small sites (<5ha) and where there is little or no promotion;
- 2.5km catchment: projects on sites with limited parking provision (i.e. no formal car park), typically relatively small sites (<10ha) with little or no promotion;
- 5km catchment: larger sites able to provide for longer visits, with formal car parks and some promotion (e.g. web presence, road signage etc).

SANGs delivery within the built-up and more urban areas poses a particular challenge and some of the best options for projects are likely to be improvements to existing sites that are known to already be busy or, conversely, where there is currently a low level of use.

Where there is uncertainty about the level of uplift, it would be possible for measures such as new parking, better linkages between sites, separation of commuters from other users and better promotion to be established prior to new housing growth. Monitoring data could then be used to identify the additional capacity created and visitor survey data could show visitor origins (postcodes) and visitor numbers clearly to justify measures as mitigation and the relevant uplift. This would be a means to ensure compliance with the regulations while maximising the SANG capacity of these existing sites.

STROUD DISTRICT COUNCIL
ENVIRONMENT COMMITTEE
THURSDAY, 21 MARCH 2024

Report Title	Brimscombe and Thrupp Neighbourhood Development Plan: Progress to Referendum
Purpose of Report	To inform councillors of progress regarding the Brimscombe and Thrupp Neighbourhood Development Plan (BTNDP) and progress to referendum following the recommendations laid out in the Examiner's Report.
Decision(s)	<p>The Committee RESOLVES:</p> <p>a) to accept all recommended modifications of the Examiner's Report (Appendix A);</p> <p>b) that the Brimscombe and Thrupp Neighbourhood Development Plan, as modified, meets the basic conditions, is compatible with the Convention rights, complies with the definition of a neighbourhood development plan (NDP) and the provisions that can be made by a NDP;</p> <p>c) to take all appropriate actions to progress the Brimscombe and Thrupp Neighbourhood Development Plan to referendum in May 2024.</p>
Consultation and Feedback	<p>The BTNDP has been through two statutory consultations. Brimscombe and Thrupp Parish Council undertook a pre-submission consultation (Regulation 14) from 15th October to 30th November 2021 and the Council undertook a post-submission consultation (Regulation 16) from 6th September to 18th October 2023. Both consultations lasted no less than the six weeks as required by the regulations.</p> <p>Brimscombe and Thrupp Parish Council considered the comments received during the Regulation 14 consultation and made changes to the plan. The comments received during the Council's Regulation 16 consultation were provided to the examiner of the plan who considered them during the examination.</p>
Report Author	Simon Maher, Senior Neighbourhood Planning Officer Email: simon.maher@stroud.gov.uk

Options	<p>Option 1 - Make modifications to the BTNDP in accordance with the examiner’s recommendations</p> <p>This is the option promoted by this report. It consists of accepting the recommendations made in the neighbourhood plan examination report, determining that the BTNDP meets the basic conditions and all legal requirements and should therefore proceed to a referendum. This approach is considered to be the best option for progressing the plan prepared by the community without any unnecessary delay in the decision making process.</p> <p>Option 2 – Make a decision that differs from the examiner’s recommendation</p> <p>If the Council were to propose a decision that differs from the examiner’s recommendation, the Council is required to:</p> <ol style="list-style-type: none"> 1. notify all those identified on the consultation statement of the town council and invite representations, during a period of six weeks, 2. refer the issue to a further independent examination if appropriate. <p>Option 3 - Refuse the Plan</p> <p>The Council can decide that it is not satisfied with the plan proposal with respect to meeting basic conditions, compatibility with Convention rights, definition and provisions of the NDP even if modified. Without robust grounds, which are not considered to be present in this case, refusing to take the plan to a referendum could leave the Council vulnerable to a legal challenge.</p>			
	Background Papers N/A			
	Appendices Appendix A – Examiner’s Report			
Implications (further details at the end of the report)	Financial	Legal	Equality	Environmental
	Yes	Yes	No	Yes

1. Background

- 1.1 Neighbourhood planning was introduced through the Localism Act 2011. New powers allowed qualifying bodies (parish or town councils) to produce NDPs. NDPs allow communities to set planning policies for their area.
- 1.2 Once adopted, NDPs join the adopted Local Plan in the Council’s Development Plan. They must be considered when planning decisions are made, along with the Local Plan and national planning policy.
- 1.3 Following an update to Neighbourhood Planning guidance in response to the COVID-19 pandemic, the plan will now carry significant weight in decision making if approved to proceed to referendum.

- 1.4 Producing a NDP allows parish and town councils to increase the amount of Community Infrastructure Levy (CIL) funds they receive from developments within their area from 15% to 25%.
- 1.5 NDPs must be examined by a suitably qualified independent person, appointed by the Council and agreed by the qualifying body (Town/Parish Council). Neighbourhood plans must also pass a referendum of local voters by a simple majority. If a plan passes referendum, the Council must make (adopt) it, unless it breaches EU obligations or human rights legislation.
- 1.6 For the background papers and associated documents associated with this NDP can be found on our [website](#).

2. Brimscombe and Thrupp Neighbourhood Development Plan and Examination

- 2.1 The Brimscombe and Thrupp Neighbourhood Area was designated by resolution of the Council's Environment Committee on 22nd February 2016.
- 2.2 On 11th March 2021 Brimscombe & Thrupp Parish Council applied for an amendment to the designated Neighbourhood Area boundary to reflect changes to the Brimscombe and Thrupp Parish Boundary in May 2020. A 6 week consultation on this proposal took place from 9th April to 21st May 2021. Following the consultation period the new boundary was applied.
- 2.3 The BTNDP was led by Brimscombe and Thrupp Parish Council ('the qualifying body').
- 2.4 A submission version of the BTNDP was accepted by the Council on 3rd August 2023, under regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the regulations'). As prescribed by 'the regulations', the Council consulted on the plan for six weeks and arranged for the plan to be examined.
- 2.5 The Council appointed John Slater MRTPI as independent examiner of the BTNDP.
- 2.6 The examination concludes once the Examiner's Report is received by the Council. The Examiner's Report contains a recommendation of whether the BTNDP, with or without modifications, should proceed to a referendum.
- 2.7 The examiner's findings, including recommendations and the reasons for them, are set out in the Examiner's Report (Appendix A). The examiner only makes recommendations necessary to make the Plan, meet the basic conditions and other legal requirements.
- 2.8 The recommended modifications to the BTNDP are set out throughout the Examiner's Report (Appendix A).

3. Consideration and Next Steps

- 3.1 Following the completion of the examination, the Council is required to consider each of the examiner's recommendations and the reasons for them and decide what action to take in response to each. Officers have reviewed the Examiner's Report and agree with all the recommendations and the reasons for them.
- 3.2 The Council is required to consider whether the draft BTNDP meets the basic conditions, is compatible with the Convention rights and complies with the definition of an NDP and the provisions that can be made by a NDP or can do so as modified.
- 3.3 Officer's have carefully considered the BTNDP and the Examiner's report and consider that:

- 3.3.1 The BTNDP, as modified by the Examiner's recommendations, has had regard to national policies and advice contained in guidance issued by the Secretary of State. The BTNDP has been assessed against the National Planning Policy Framework and national Planning Practice Guidance and modifications proposed to comply with national policy.
- 3.3.2 The BTNDP, as modified by the Examiner's recommendations, contributes to the achievement of sustainable development. The BTNDP has been subject to sustainability assessment that identifies the plan will have an overall positive effect.
- 3.3.3 The BTNDP, as modified by the Examiner's recommendations, is in general conformity with the strategic policies contained in the development plan as a whole for the area. The BTNDP has been assessed against the adopted Stroud District Local Plan and modifications proposed to ensure the BTNDP does not become out-of-date in the context of a review of strategic policies in the Local Plan.
- 3.3.4 The BTNDP, as modified by the Examiner's recommendations, would not breach, and be otherwise incompatible with EU obligations. The Examiner's assessment has involved considering the following Directives: the Strategic Environmental Assessment Directive (2001/42/EC); the Environmental Impact Assessment Directive (2011/92/EU); the Habitats Directive (92/43/EEC); the Wild Birds Directive (2009/147/EC); the Waste Framework Directive (2008/98/EC); the Air Quality Directive (2008/50/EC); and the Water Framework Directive (2000/60/EC). In addition, no issue arises in respect of equality under general principles of EU law or any EU equality directive. The Council issued a Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Determination in September 2022, which confirmed to Brimscombe and Thrupp Parish Council that a SEA and a full HRA were not required on the BTNDP.
- 3.3.5 The BTNDP, as modified by the Examiner's recommendations, would not give rise to significant environmental effects on European sites and European offshore marine sites. The Council issued a Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Determination in September 2022, which confirmed to Brimscombe and Thrupp Parish Council that a SEA and a full HRA were not required on the BTNDP.
- 3.3.6 The BTNDP, as modified by the Examiner's recommendations, is in all respects fully compatible with Convention rights contained in the Human Rights Act 1988. The Examiner considered the Convention's Articles 6(1), 8 and 14 and its First Protocol Article 1. Nothing in his examination of the Draft BTNDP indicated any breach of a Convention right. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known.
- 3.3.7 The BTNDP, as modified by the Examiner's recommendations, complies with the definition of an NDP and the provisions that can be made by a NDP. The BTNDP sets out policies in relation to the development and use of land in the whole of the neighbourhood area; it specifies the period for which it is to have effect; it does not include provision about development that is 'excluded development' and does not relate to more than one neighbourhood area or repeat an existing planning permission.

- 3.4 Subject to consideration at the meeting, members are asked to authorise officers to make the modifications specified in the Examiner's Report and progress the modified version of the plan to a referendum.
- 3.5 The neighbourhood area matches the civic boundary of Brimscombe and Thrupp Parish; officers recommend that the referendum area should remain that of the Brimscombe and Thrupp Neighbourhood Area, as designated by the Council on 22nd February 2016. However, the Council cannot make a decision that differs from the examiners' recommendations about the referendum area.
- 3.6 The Council must publish a statement setting out its decision and the reason for making it. The qualifying body will need to modify the plan and produce a final version for the referendum.
- 3.7 The Council must hold a referendum within 56 working days from the date that the decision to take the plan forward to a referendum is published. In consultation with the Council's returning officer and elections department, May 2024 has been identified as the suitable date for holding a referendum.
- 3.8 If the plan passes referendum, the Council is required to make (adopt) it unless it breaches EU or Human Rights legislation. The Council's scheme of delegation does not delegate this decision to officers or the Environment Committee, so the decision to make the plan will be made by full Council. This decision is expected to take place in July 2024. The plan cannot be modified at that stage.

4. Implications

4.1 Financial Implications

There are no direct financial implications arising from this recommendation. Not to accept the recommendations could lead to costs associated with legal challenge.

Adele Rudkin, Accountant

Tel: 01453 754109 Email: adele.rudkin@stroud.gov.uk

4.2 Legal Implications

Following the independent examination of the neighbourhood plan and after the examiner's report has been received, the Council must come to its formal view on whether the draft neighbourhood plan meets the 'basic conditions'. Only a draft neighbourhood plan that meets each of the basic conditions can be put to a referendum and be made. The basic conditions are set out in [Paragraph 8\(2\) of Schedule 4B to the Town and Country Planning Act 1990](#) as applied to neighbourhood plans by Section 38A of the Planning and Compulsory Purchase Act 2004. These are:

- a. Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan. This includes the NPPF.
- b. The making of the neighbourhood plan contributes to the achievement of sustainable development. The plan should contribute to improvements in environmental, economic and social conditions or that consideration has been given to how any potential adverse effects arising from the proposals may be prevented, reduced or offset.
- c. The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the Council's area.

- d. The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations. There are 4 Directives that may be of particular relevance to neighbourhood planning namely, the Strategic Environmental Assessment (SEA) Directive, the Environmental Impact Assessment (EIA) Directive, the Habitats Directive and the Wild Birds Directive
- e. Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. These include not breaching the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017, which set out the habitat regulation assessment process for land use plans, including consideration of the effect on habitats sites.

The Council must consider the examiner's report to ensure that the neighbourhood plan meets the basic conditions and to determine whether or not it should proceed to referendum, with or without modifications. Unless otherwise agreed with the qualifying body, this decision must be made within 5 weeks of the Council receiving the examiner's report.

If the Council decides that the neighbourhood plan meets the basis conditions or would meet those conditions if modifications were made to the plan (whether or not recommended by the examiner) then a referendum must be held.

Martin Evans Locum Planning Lawyer, One Legal
Tel: 01684 272227 Email: legalservices@onelegal.org.uk

4.3 Equality Implications

As part of the Examination process the plan was found to meet the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. A requirement of meeting these conditions is that the plan must be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

No Equality Impact Assessment has been carried out.

4.4 Environmental Implications

The Neighbourhood Plan General Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required. In order to comply with this requirement, Stroud District Council (SDC) undertook a screening exercise in November 2019 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. As a result of this process SDC concluded that the Plan is not likely to have any significant effects on the environment and accordingly would not require an SEA.

SDC also prepared a Habitats Regulations Assessment (HRA) of the Plan. It concludes that the neighbourhood plan will not give rise to likely significant effects on European sites,

either alone or in combination with other plans or projects, and that Appropriate Assessment is not required.

As part of the Examination process the plan was found to meet the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. A requirement of meeting these conditions is that the plan must contribute to the achievement of sustainable development and not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 (7).

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Brimscombe and Thrupp Neighbourhood Development Plan 2022-2040

Submission Version

A Report to Stroud District Council on the Examination of the
Brimscombe and Thrupp Neighbourhood Development Plan

John Slater BA (Hons), DMS, MRTPI, FRGS

John Slater Planning Ltd

18th January 2024

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Executive Summary

My examination has concluded that the Brimscombe and Thrupp Neighbourhood Development Plan should proceed to referendum, subject to the Plan being amended in line with my recommended modifications, which are required to ensure the plan meets the basic conditions. The more noteworthy include –

- Removing reference to the Community Energy Enterprise model in terms of renewable or low carbon energy generation and clarifying that the requirements for delivering community benefit does not relate to the installation of solar panels or similar private schemes on existing buildings / sites.
- Removing from the Sustainable Transport policy the need to have regard to the Sustainable Transport Hierarchy and supporting development which contributes to improving pedestrian and cycling facilities along the A419.
- Ensuring that the measures to be taken to deliver improvements in the natural environment are relevant to the nature and location of the proposed development.
- Including reference to the National Design Guide in the design policy.
- Removing three locally valued viewpoints from the Key Views policy.
- Introducing into the new or start up business policy the requirement that severe impacts are appropriately mitigated.
- Clarifying that the working from home policy only applies where planning permission is actually required.

The referendum area does not need to be extended beyond the Plan area.

Introduction

1. Neighbourhood planning is a process, introduced by the Localism Act 2011, which offers local communities the opportunity to create the policies that will shape the places where they live and work. A neighbourhood plan does provide the community with the ability to allocate land for particular purposes and to prepare the policies that will be used in the determination of planning applications in its area. Once a neighbourhood plan is made, it will form part of the statutory development plan alongside the policies in the Stroud Local Plan, adopted in November 2015. Decision makers are required to determine planning applications in accordance with the development plan, unless material considerations indicate otherwise.
2. The neighbourhood plan making process has been undertaken under the supervision of Brimscombe and Thrupp Parish Council. A Steering Group was appointed to undertake the Plan's preparations.
3. This report is the outcome of my examination of the Submission Version of the Brimscombe and Thrupp Neighbourhood Development Plan. My report will make recommendations, based on my findings, on whether the Plan should go forward to a referendum. If the Plan then receives the support of over 50% of those voting at the referendum, the Plan will be "made" by Stroud District Council.

The Examiner's Role

4. I was appointed by Stroud District Council in October 2023, with the agreement of Brimscombe and Thrupp Parish Council, to conduct this examination.
5. In order for me to be appointed to this role, I am required to be appropriately experienced and qualified. I have over 45 years' experience as a planning practitioner, primarily working in local government, which included 8 years as a Head of Planning at a large unitary authority on the south coast, but latterly as an independent planning consultant and director of my neighbourhood planning consultancy, John Slater Planning Ltd. I am a Chartered Town Planner and a member of the Royal Town Planning Institute. I am independent of Stroud District Council and Brimscombe and Thrupp Parish Council and I can confirm that I have no interest in any land that is affected by the Neighbourhood Plan.

6. Under the terms of the neighbourhood planning legislation, I am required to make one of three possible recommendations:
 - That the Plan should proceed to referendum on the basis that it meets all the legal requirements.
 - That the Plan should proceed to referendum, if modified.
 - That the Plan should not proceed to referendum on the basis that it does not meet all the legal requirements.
7. Furthermore, if I am to conclude that the Plan should proceed to referendum, I need to consider whether the area covered by the referendum should extend beyond the boundaries of the area covered by the Brimscombe and Thrupp Neighbourhood Plan area.
8. In examining the Plan, the Independent Examiner is expected to address the following questions:
 - Do the policies relate to the development and use of land for a Designated Neighbourhood Plan area in accordance with Section 38A of the Planning and Compulsory Purchase Act 2004?
 - Does the Neighbourhood Plan meet the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 - namely that it specifies the period to which it is to have effect? It must not relate to matters which are referred to as “excluded development” and also that it must not cover more than one Neighbourhood Plan area.
 - Has the Neighbourhood Plan been prepared for an area designated under Section 61G of the Town and Country Planning Act 1990 and been developed and submitted by a qualifying body?
9. I am able to confirm that the Plan, only relates to the development and use of land, covering the extended area which was designated by Stroud District Council, for the Brimscombe and Thrupp Neighbourhood Plan, on 24th May 2021, which followed revisions to the Parish Council boundary.
10. I can also confirm that it does specify the period over which the Plan has effect, namely the period from 2022 up to 2040.
11. I can confirm that the Plan does not contain policies dealing with any “excluded development”.
12. There are no other neighbourhood plans covering the area covered by the neighbourhood area designation.
13. I am satisfied that Brimscombe and Thrupp Parish Council as a parish council can act as a qualifying body under the terms of the legislation.

The Examination Process

14. Once I had reviewed the submitted documents, my first task was to conduct a site visit to Brimscombe and Thrupp. That was carried out on Wednesday 15th November 2023.
15. I entered the parish from the direction of Stroud Town Centre and I initially drove the length of the parish, along the A419 to orientate myself. During the course of the next 2 ½ hours, I drove around the plan area, climbing up the hillside, with its properties running parallel to the scarp slope. I explored the countryside beyond the scarp line, up Claypit Lane, where I saw the impressive setting of Nether Lypiatt Manor. I also drove up the side valley along Toadsmoor Road before turning around at Chalford. I visited a number of the key sites along the canalside, including Brimscombe Mill and Brimscombe Port. I was able to appreciate many of the key views identified in the plan.
16. During my visit, I also drove up Butterrow Hill to Rodborough Common and looked back across the valley towards Thrupp. I was able to visit many of the proposed local green spaces and also the green spaces of community significance, as well as the row of shops at Brimscombe Corner which lie along the main road.
17. Upon my return from Gloucestershire, I prepared the document entitled Initial Comments of the Independent Examiner, dated 17th November 2023, which asked questions of both the Parish Council and Stroud District Council. In that note, I expressed my view that the examination would not need a public hearing and that remains the case.
18. I received the response from Stroud District Council on 8th December 2023 and from Brimscombe and Thrupp Parish Council, on 9th December 2023. Both responses were placed on the appropriate websites.

The Consultation Process

19. The Neighbourhood Development Plan Steering Group was set up in 2016, following two earlier public meetings which established the community's appetite to get involved with neighbourhood planning.
20. The first community event was a "drop in" event held on 22nd January 2017 at Stroud Brewery, which was attended by 120 people. This was followed by a Design Day, held on 21st May 2017, which helped identify the different character areas. A Climate Change Workshop was then held on 19th January 2020.
21. In autumn 2021, a residents' survey was conducted and this produced 129 responses.

22. The work of the Steering Group was publicised by reports presented regularly to the Parish Council, as well as via articles on the Parish website and Facebook pages.
23. All this work culminated in the preparation of a Pre-Submission version of the neighbourhood plan, which was subject to what was known as the Regulation 14 consultation, held over eight weeks, which ran from 16th July 2022 until 10th September 2022. This consultation produced 15 responses. Some changes to the document were subsequently made and these are shown in Section 5 of the Consultation Statement.
24. I am satisfied that the community have had a number of opportunities to be able to influence the content of the neighbourhood plan.

Regulation 16 Consultation

25. I have had regard, in carrying out this examination, to all the comments made during the period of final consultation, which took place over a six-week period, between 6th September 2023 and 18th October 2023. This consultation was organised by Stroud District Council, prior to the Plan being passed to me for its examination. That stage is known as the Regulation 16 consultation.
26. In total, 10 responses were received, including: Stroud District Council, National Highways, Historic England, Gloucestershire County Council, Environment Agency, Sports England, Stroud Town Council, Regeneration Delivery lead - Stroud DC, Natural England and Network Rail.
27. I have carefully read all the correspondence and I will refer to the representations where relevant to my considerations and conclusions in respect of specific policies or the Plan as a whole.

The Basic Conditions

28. The Neighbourhood Planning Examination process is different to a Local Plan Examination, in that the test is not one of “soundness”. The Neighbourhood Plan is tested against what are known as the Basic Conditions as set down in legislation. It will be against these criteria that my examination must focus.
29. The five questions, which seek to establish that the Neighbourhood Plan meets the basic conditions test, are: -
- Is it appropriate to make the Plan having regard to the national policies and advice contained in the guidance issued by the Secretary of State?
 - Will the making of the Plan contribute to the achievement of sustainable development?

- Will the making of the Plan be in general conformity with the strategic policies set out in the Development Plan for the area?
 - Will the making of the Plan breach or be otherwise incompatible with EU obligations or human rights legislation?
 - Will the making of the Plan breach the requirements of Regulation 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017?
30. On 19th December 2023, the Secretary of State published a new version of the National Planning Policy Framework. However paragraph 230 of the new Framework states that for the purpose of examining plans, where the plan has reached pre – submission consultation stage before 19th March 2024, the plan will be examined against the policies in the relevant previous version of the Framework, which is the NPPF published on 5th September 2023. All references to the NPPF in this report will refer to that version of the Framework, unless otherwise stated.

Compliance with the Development Plan

31. To meet the basic conditions test, the Neighbourhood Plan is required to be in general conformity with the strategic policies of the Development Plan, which in this case is the Stroud District Local Plan, which was adopted in November 2015. This covers the period 2015 to 2031.
32. Policy CP2 includes a presumption that housing development will take place within settlement development limits for the areas outside the strategic sites. B Class employment development can take place within designated employment areas.
33. Policy CP3 sets the settlement hierarchy. Brimscombe is included within the third tier of settlements - Accessible Villages with Limited Facilities, which are described as villages possessing a limited level of facilities and services, which together with local employment, provide the best opportunities, outside the local service centres, for greater self-containment. They will provide for lesser levels of development, in order to safeguard their role and offer neighbourhood plans some opportunities for growth and to deliver affordable housing. These are all strategic policies.
34. Thrupp is included within the fourth tier of settlements known as Accessible Settlements with Minimal Facilities, where development will be limited to that needed to help meet the housing needs assessment and to improve employment opportunities, services and facilities
35. Brimscombe and Thrupp falls within the Stroud Valleys Cluster. Policy SA1 supports development at the following locations, Ham Mill for 100 dwellings and employment uses, Brimscombe Mill for 40 dwellings and

employment uses and Brimscombe Port for 150 dwellings, canal related tourism and employment uses. Policy HC1 supports residential development within the defined settlement limits as shown on the Local Plan's Proposal Map, subject to meeting 9 criteria.

36. Policy E11 identifies 3 key employment sites in the parish, Griffin Mills Industrial Estate, Hope Mills Industrial Estate, and Phoenix Industrial Estate.
37. Stroud District Council is currently preparing a Local Plan Review which will take the local plan through the period up to 2040. The draft local plan has reached its examination stage. That examination was paused for a summer break in June 2023 and the Inspectors raised concerns regarding two strategic allocations, as well as the wider Strategic Road Network. The District Council is working with National Highways and the County Council to address these issues and it has requested a six month pause to undertake a Joint Action Plan. A recent letter from the Local Plan Inspectors has raised concerns regarding the amount of work required and suggest that a pause of at least 12 months may be required. The District Council has been asked to respond.
38. In this draft plan, Brimscombe and Thrupp is a Tier 3a) settlement, an accessible settlement with local services which are expected to deliver lower level of growth than settlements designated as local service centres. The parish is expected to allocate land for 190 dwellings under draft Core Policy CP2. The plan again makes allocation at Brimscombe Mill and Brimscombe Port. It allows limited development within, and in exceptional circumstances, adjacent to settlement development limits.
39. I can attach little weight to the emerging policies, in terms of the basic conditions which relate to general conformity with strategic policies in the adopted local plan, however they do indicate to a certain extent a "direction of travel".
40. My overall conclusion is that the Neighbourhood Plan is in general conformity with the strategic policies in the adopted Stroud Local Plan.

Compliance with European and Human Rights Legislation

41. Stroud District Council issued a Screening Opinion, dated 28th September 2023 which concluded, having consulted with the three statutory consultees, that a full strategic environmental assessment, as required by EU Directive 2001/42/EC which is enshrined into UK law by the "Environmental Assessment of Plans and Programmes Regulations 2004", would not be required.
42. The District Council, as competent authority, issued a screening under the Habitat Regulations, in the same letter. This agreed with the assessment of Natural England that the plan is unlikely to have any significant adverse effects on European Protected sites.

Appendix A

43. I am satisfied that the basic conditions regarding compliance with European legislation, including the 2017 introduced basic condition regarding compliance with the Habitat Regulations, are met. I am also content that the plan has no conflict with the Human Rights Act.

The Neighbourhood Plan: An Overview

44. I must firstly commend the Parish Council and the Steering Group for the amount and quality of the work that has been put into this neighbourhood plan exercise. I wish to pay particular tribute to the design and layout of the submission document. It is refreshing to be presented with such a clear and attractive document. It makes really good use of photographs and drawings. I found the section “What does this mean for me as a resident of the Parish”, particularly enlightening and it is an innovation that other neighbourhood plans could learn from, in making planning policy relevant to persons contemplating their own individual projects or developments.
45. Brimscombe and Thrupp is a fascinating parish, which I was pleased to discover and explore for the first time. As an area, it clearly faces regeneration challenges, focused on a number of key sites along with valley bottoms. However, the area’s industrial heritage also offers exciting possibilities for regeneration, complemented by a really attractive setting, which is recognised by its conservation area status. The unique geography of the parish presents stunning long-distance views, including of areas of farmland and woodland, which are attractive features of the AONB, which lies above the scarp line.
46. This is a neighbourhood plan that is very firmly focused on the parish of Brimscombe and Thrupp. It seeks to produce planning policy covering the matters that are important to the community, such as recognising the importance of key viewpoints and taking advantage of the area’s linear green and blue infrastructure assets and encouraging new employment opportunities as well as home working.
47. As part of the development plan, it will sit comfortably beside the adopted local plan and it does not seek to duplicate that document’s policies, such as those that establish the settlement boundary or makes key allocations for major sites along the valley floor. It does not seek to address questions of housing numbers or housing need – nor does it need to.
48. Whilst commending the documents design, I did have cause to raise some concerns regarding the quality and in particular the clarity of the mapping. This is in part a reflection of the unique geography of the Parish, in that much of the development is concentrated in relatively discrete areas, such as the valley floor and the valley sides. It is

important that the plan can be used with confidence by decision-makers and that depends on the providing clarity as to where specific policies apply. I was particularly concerned about being able to identify the specific locations of some of the key viewpoints and also the extent of some of identified and protected open spaces. I am reassured that these difficulties can be overcome and I will leave it to the Parish Council, working with the Stroud Planning department, to ensure that the final versions of this plan overcome these mapping challenges.

49. I have in a number of cases had to make proposed changes, in terms of reducing the expectations placed on applicants applying for planning permission. The scope of the neighbourhood plan to be able to dictate what information must be provided to accompany a planning application has to be tempered by what is proportionate, and should not be over onerous, especially if applied to all development taking place in the area, irrespective of its nature. The responsibility for identifying what reports and documents that must be submitted with a planning application lies with the District Council, via the local validation list.
50. The policies in the plan encourage high-quality design and I particularly commend the Community Design Statement that describes the different areas and how their components contribute to the parish's distinctiveness. The plan encourages more sustainable energy generation, sustainable transport and places importance on protecting the natural environment and the green and blue infrastructure assets. It seeks to protect community services and local green spaces. Taken as a whole, I am satisfied that the neighbourhood plan will deliver sustainable development.
51. My examination has concentrated on the plan's policies and their wording and whether the plan as a whole meets the basic conditions, as well as the other legal tests. It is beyond the scope of my role as examiner to have to re-draft the supporting text. There will be a need for an editing exercise to be undertaken, in view of the changes that I am recommending, to ensure that the resultant plan reflects my recommendations, yet still reads as a cogent and coherent planning document.
52. I will leave it to the Parish Council to work alongside the District Council planners to make these consequential changes to the supporting text and justifications, when preparing the Referendum Version of the plan, which will have to be published alongside Stroud District Council's Decision Statement.

The Neighbourhood Development Plan Policies

Policy CC1: Retrofitting Existing Buildings to Improve Energy Efficiency

53. As this is a policy that offers support for proposals which retrofit energy-efficiency measures to buildings, where these require planning permission, I am satisfied the policy meets basic conditions, particularly as it is not seeking to impose any requirements on applicants to carry out such works, which could conflict the Secretary of State policy that neighbourhood plans should not impose additional technical standards, in terms of construction, performance and layout of new dwellings. The policy does not require any modification.

Policy CC2: Renewable or Low Carbon Energy Generation in Brimscombe and Thrupp

54. I sought clarification from the Parish Council of a number of issues, as set out in my Initial Comments. Firstly, I needed to understand whether all the criteria applied and the Parish Council replied that its intention was that clause a) should apply in all cases and either clause b) or clause c).
55. The Parish Council, having reflected on the Regulation 16 comments, is now suggesting that the requirements in clause c) should only be schemes which are fully or partly owned by Brimscombe and Thrupp residents and businesses and should include provision that parish residents should be given priority. I am happy to accept that modification, which is more in line with the Secretary of State aspirations, are set out in paragraph 156 of the NPPF.
56. I believe that the originally suggested Community Energy Enterprise would have been a too restrictive model and there are other mechanisms to ensure that the local community benefits from new sustainable energy development that takes place within the parish. Clearly this would not be a relevant consideration where solar panels are placed on existing buildings or within the curtilage of a building or where a riparian owner wishes to harness hydro power. I will add this to the policy as a recommendation, as it would be counterproductive if the policy could be interpreted as seeking to prevent property owners from taking advantage of renewable energy.

Recommendations

Insert at the end of a) “and”, and at the end of b) replace ‘and’ with “or”

In c) delete the second sentence up to and including “evidence CEE delivery was not possible and that”

At the end, insert “This policy does not apply to solar panels placed on existing or proposed new buildings or within the curtilage of such sites or owner promoted hydro- power on riparian sites.”

Policy CC3: Sustainable Transport

57. I have reservations with regard to the overall policy expectation that “all developments should be planned in line with sustainable transport hierarchy”. In my experience, the main value of the hierarchy is to focus people thinking about the impact of their individual journeys, rather than as a key determinant in terms of the acceptability of development proposals. As such I do not think that the aspirations, set out in the first paragraph, as an expression of planning policy are deliverable but I have no objections to the retention of the diagram showing the Sustainable Transport Hierarchy being retained within the supporting text.
58. I do accept that the encouraging the use of non-car modes of transport should be encouraged and that is recognised by the policy requirements related to the need to produce a Travel Plan. I do agree that setting the threshold so that it applies only to major development, strikes the right balance in seeking innovative transport solutions as these are the developments with the potential to generate significant amounts of movement as required by paragraph 113 of the NPPF.
59. I am not convinced that a policy requiring contributions towards the improved environment for pedestrians and cyclists, in terms of *all* development proposals along the A419 corridor, would necessarily meet the tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 which includes, inter alia that obligations are necessary to make the development acceptable in planning terms and are directly related to the development. For example, some developments will not necessarily lead to additional cycle or pedestrian journeys and therefore do not need to contribute.
60. I will propose a similar wording to that used in Local Plan Policy CP 13 which offers support to schemes that achieve these objectives.

Recommendations

Delete the first paragraph

In the final paragraph, replace “are expected” with “which” and add at the end “will be supported”

Policy CC4: Natural Capital and Ecosystem Services

61. I share the District Council’s concerns, as set out in its Regulation 16 comments that the policy expectation that all developments will be required to set out how the development will impact on the natural environment. There will be some developments that will have no demonstrable impact on the natural environment, such as a change of use of a building or elevational alterations. I believe the correct approach is set out in the second part of the policy, which is caveated by “where relevant”.

Appendix A

62. Subject to the deletion of the first paragraph, as the District Council recommends, I believe the wording can then be retained, but with further clarifying that the policy expectations as set out in requirements a) to h) are relevant to the form of development or indeed its location.

Recommendations

Delete the first paragraph

In the second paragraph, after “where relevant” insert “to the scale and form of the development and its location.”

Policy LRD1: Locally Distinctive High Quality Design

63. In addition to the National Model Design Code, there is further national guidance set out in the National Design Guide, which is also relevant to securing the objectives of the policy. I will also propose some changes to the drafting to expect proposals to have regard to the respective design guidance.
64. Beyond that I have no comments to make on this policy.

Recommendation

In the first paragraph, after “proposals will” insert “be expected to”
After “National Model Design Guide” insert “, National Design Guide”

Policy LRD2: Locally Valued Views

65. A neighbourhood plan policy can only control development within a designated neighbourhood area. Figure 8 identifies four viewpoints that are situated outside of the parish. I was initially concerned that the scope of policy was seeking to impact on development that lay between these four viewpoints and the parish boundary. However, closer examination of the policy is that it places an obligation on the development, which by implication will be situated within the plan area, to assess the impact of the proposed scheme, on the viewpoints, which can either fall within or outside the Parish. It is not actually a policy that seeks to protect the views from the viewpoint itself.
66. I will recommend some minor drafting changes to improve the clarity of expectations of the policy. For example I do not consider it necessary for an applicant to have to identify the impact of proposed development that are not visible from that viewpoint.
67. The Parish Council has agreed to produce improved plans showing with greater clarity the positions of the viewpoints and I will recommend these be incorporated within the final document. I do not consider that it is reasonable to expect applicants to have to undertake these studies in terms of other views that are not specified in the policy. That would not provide the clarity expected of a planning policy.
68. I had some concerns regarding the choice of a number of the suggested viewpoints. In particular I raised concerns regarding LVV2 – Brimscombe Corner, which is described as a “typical view”, which I do not consider warrants the same level of protection or analysis as

say the viewpoints that are described as exceptional or important views. The plan's justification for the inclusion of that view, refers to the importance of the small businesses to the community, rather than its importance as a locally valued view.

69. Equally LVV7 – Ham Mill is not, in my opinion, a viewpoint or a vista and its justification refers to how it provides an illustration of “how future development should make sympathetic use of existing buildings rather than the complete demolition.” This does not attest to the quality of the viewpoint.
70. Finally I do not consider that the justification offered in respect of LVV 12 - Fromeside Playing Fields which is justified as being a “much-loved leisure resource” supports that designation as a locally valued view. I accept it requires protection as a community resource as that is provided by Policy CC1.
71. It appears from a contributor's comment, submitted alongside the Parish Council's response to my Initial Comments, suggests that at least one member of the Parish Council or Steering Group agreed with my conclusions on this policy!

Recommendations

Remove LVV2, LVV7 and LVV12 from the table after para 8.14 and from Figure 8 and the Appendix

Replace the first sentence of the second paragraph with “major development proposals will be expected to show whether the development would be visible from the identified Locally Valued Views as shown in table 1 and mapped on figure 8 and where there is intervisibility how the development would be viewed from those viewpoints.”

Include detailed inset plans showing the location of each of the locally valued viewpoints

Policy LRD3: Pre – application Community Engagement

72. Paragraph 132 of the NPPF does, in terms of its discussion on design quality and encouraging early discussion on the design and style of emerging schemes, recognise that in that context “applications that can demonstrate early, proactive and effective engagement with the community should be looked at more favourably than those that cannot”. Clearly that is a policy that has implications in terms of how an application is to be determined, as opposed to how an application is processed. Equally, the Framework, when extolling the benefits of pre application engagement, recognises that a developer cannot be required to engage with pre application discussions.
73. I consider the purpose of the policy will be more clearly understood if the policy should be one that concentrates on encouraging that community engagement. However to be clear this policy cannot be used to refuse what would be an acceptable planning application, just because the proposed protocol has not been followed.

Recommendations

Re order the paragraphs so that the third paragraph becomes the first paragraph followed by the first and second paragraph. In the new first paragraph, delete “therefore” and in the final paragraph, replace “expected” with “encouraged”

Policy E1: New and Start Up Businesses

74. My only reservation with this policy is that whilst the impacts of development on the issues identified can be properly assessed, I consider the policy should go further to support new employment by offering the scope to enable schemes to include measures so that “any severe impacts are appropriately mitigated”.

Recommendation

In the first paragraph, after “impact of proposals” insert “and any severe impacts are appropriately mitigated”

Policy E2: Home Working

75. I believe that it would assist the clarity of the policy to recognise that many proposals residential extensions and conversions to enable people to work from home may not actually require permission if they are uses which are incidental to the residential use the property. I will insert an appropriate caveat as a recommendation. I will also include the suggested changes proposed by the parish council to replace “commercial space” with “working space”.

Recommendations

**In the second paragraph replace “commercial” with “working”
After “residential properties” insert “, and where planning permission is required,”**

Policy CC1: Local Green Space

76. I consider that it would improve the clarity of the policy to confirm that the plan is designating the areas of local green space so as to have the same status as set out in paragraphs 101 to 103 of the Framework. I have no comments to make on the choice of the local green spaces which have been appropriately justified by the information set out in Appendix 2.

77. I note that the owner of LG8 had questioned at Regulation 14 stage the inclusion of the Bourne Orchard site but I note that the appeal for 4 houses on the site was dismissed on appeal and there is no reason why the community should not confer LGS status.

Recommendation

**At the start of the first paragraph, insert “The following sites are”
After “Local Green Spaces” insert “in accordance with the provisions set out in paragraphs 101 to 103 of the NPPF (September 2023 version)
Insert the list of LGSs after the first paragraph**

Policy CW2: Green Spaces of Community Significance

78. The Parish Council has agreed to the District Council's Regulation 16 suggestion that the title of the policy should be changed to "green and blue infrastructure" and then identified areas should be described as "identified areas of green and blue infrastructure".
79. I was initially concerned with the boundaries of the space are not properly defined on the maps. I have subsequently been provided by the link that reassures me that the boundaries of the individual areas can be properly delineated, albeit as it was shown in reference to an aerial photograph. I propose to leave it to the Steering Group and the District Council to agree the actual mapping of these areas when preparing the Referendum Version of the plan.

Recommendations

Retitle the policy with "Green and Blue Infrastructure"

Retitle the table "Identified Areas of Green and Blue Infrastructure"

Replace Figure 9 with a map that clearly shows the boundaries of all the sites

Policy CC3: Footpaths, Bridleways and Cycleways

80. I have no comments to make on this policy.

Policy CW3: Community Facilities

81. I am satisfied that the policy is in line with the Secretary of State's approach as set out in paragraph 93 of the NPPF and I have no recommendations to make.

The Referendum Area

82. If I am to recommend that the Plan progresses to its referendum stage, I am required to confirm whether the referendum should cover a larger area than the area covered by the Neighbourhood Plan. In this instance, I can confirm that the enlarged area of the Brimscombe and Thrupp Parish Neighbourhood Plan as designated by Stroud District Council on 24th May 2021 is the appropriate area for the referendum to be held and the area for the referendum does not need to be extended.

Summary

83. I congratulate Brimscombe and Thrupp Parish Council on reaching a successful outcome to the examination of its neighbourhood plan and I particularly commend the design and layout of the submission version. It is a really attractive document to work with compared to other neighbourhood plans I have examined.

Appendix A

84. This is a locally distinctive neighbourhood plan which deals with the issues that are important to the Brimscombe and Thrupp residents and businesses.
85. To conclude, I can confirm that my overall conclusions are that the Plan, if amended in line with my recommendations, meets all the statutory requirements including the basic conditions test, and that it is appropriate, if successful at referendum, that the Plan be made.
86. **I am therefore delighted to recommend to Stroud District Council, that the Brimscombe and Thrupp Neighbourhood Plan, as modified by my recommendations, should proceed, in due course, to referendum.**

JOHN SLATER BA(Hons), DMS, MRTPI, FRGS
John Slater Planning Ltd
18th January 2024

STROUD DISTRICT COUNCIL
ENVIRONMENT COMMITTEE
THURSDAY, 21 MARCH 2024

Report Title	Slimbridge Neighbourhood Development Plan: Progress to Referendum
Purpose of Report	To inform councillors of progress regarding the Slimbridge Neighbourhood Development Plan (SNDP) and progress to referendum following the recommendations laid out in the Examiner's Report.
Decision(s)	<p>The Committee RESOLVES:</p> <ul style="list-style-type: none"> a. to accept all recommended modifications of the Examiner's Report (Appendix A); b. that the Slimbridge Neighbourhood Development Plan, as modified, meets the basic conditions, is compatible with the Convention rights, complies with the definition of a neighbourhood development plan (NDP) and the provisions that can be made by a NDP; c. to take all appropriate actions to progress the Slimbridge Neighbourhood Development Plan to referendum in May 2024.
Consultation and Feedback	<p>The SNDP has been through two statutory consultations. Slimbridge Parish Council undertook a pre-submission consultation (Regulation 14) from 23rd January to 5th March 2023 and the Council undertook a post-submission consultation (Regulation 16) from 18th September to 30th October 2023. Both consultations lasted no less than the six weeks as required by the regulations.</p> <p>Slimbridge Parish Council considered the comments received during the Regulation 14 consultation and made changes to the plan. The comments received during the Council's Regulation 16 consultation were provided to the examiner of the plan who considered them during the examination.</p>
Report Author	Simon Maher, Senior Neighbourhood Planning Officer Email: simon.maher@stroud.gov.uk

Options	<p>Option 1 - Make modifications to the SNDP in accordance with the examiner’s recommendations</p> <p>This is the option promoted by this report. It consists of accepting the recommendations made in the neighbourhood plan examination report, determining that the SNDP meets the basic conditions and all legal requirements and should therefore proceed to a referendum. This approach is considered to be the best option for progressing the plan prepared by the community without any unnecessary delay in the decision making process.</p> <p>Option 2 – Make a decision that differs from the examiner’s recommendation</p> <p>If the Council were to propose a decision that differs from the examiner’s recommendation, the Council is required to:</p> <ol style="list-style-type: none"> 1. notify all those identified on the consultation statement of the town council and invite representations, during a period of six weeks, 2. refer the issue to a further independent examination if appropriate. <p>Option 3 - Refuse the Plan</p> <p>The Council can decide that it is not satisfied with the plan proposal with respect to meeting basic conditions, compatibility with Convention rights, definition and provisions of the NDP even if modified. Without robust grounds, which are not considered to be present in this case, refusing to take the plan to a referendum could leave the Council vulnerable to a legal challenge.</p>			
	Background Papers N/A			
	Appendices Appendix A – Examiner’s Report			
Implications (further details at the end of the report)	Financial	Legal	Equality	Environmental
	Yes	Yes	Yes	Yes

1. Background

- 1.1 Neighbourhood planning was introduced through the Localism Act 2011. New powers allowed qualifying bodies (parish or town councils) to produce NDPs. NDPs allow communities to set planning policies for their area.
- 1.2 Once adopted, NDPs join the adopted Local Plan in the Council’s Development Plan. They must be considered when planning decisions are made, along with the Local Plan and national planning policy.
- 1.3 Following an update to Neighbourhood Planning guidance in response to the COVID-19 pandemic, the plan will now carry significant weight in decision making if approved to proceed to referendum.

- 1.4 Producing a NDP allows parish and town councils to increase the amount of Community Infrastructure Levy (CIL) funds they receive from developments within their area from 15% to 25%.
- 1.5 NDPs must be examined by a suitably qualified independent person, appointed by the Council and agreed by the qualifying body (Town/Parish Council). Neighbourhood plans must also pass a referendum of local voters by a simple majority. If a plan passes referendum, the Council must make (adopt) it, unless it breaches EU obligations or human rights legislation.
- 1.6 For the background papers and associated documents associated with this NDP can be found on our [website](#).

2. Slimbridge Neighbourhood Development Plan and Examination

- 2.1 The Slimbridge Neighbourhood Area was designated by resolution of the Council's Environment Committee on 23rd July 2020.
- 2.2 The SNDP was led by Slimbridge Parish Council ('the qualifying body').
- 2.3 A submission version of the SNDP was accepted by the Council on 26th July 2023, under regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the regulations'). As prescribed by 'the regulations', the Council consulted on the plan for six weeks and arranged for the plan to be examined.
- 2.4 The Council appointed John Slater MRTPI as independent examiner of the SNDP.
- 2.5 The examination concludes once the Examiner's Report is received by the Council. The Examiner's Report contains a recommendation of whether the SNDP, with or without modifications, should proceed to a referendum.
- 2.6 The examiner's findings, including recommendations and the reasons for them, are set out in the Examiner's Report (Appendix A). The examiner only makes recommendations necessary to make the Plan, meet the basic conditions and other legal requirements.
- 2.7 The recommended modifications to the SNDP are set out throughout the Examiner's Report (Appendix A).

3. Consideration and Next Steps

- 3.1 Following the completion of the examination, the Council is required to consider each of the examiner's recommendations and the reasons for them and decide what action to take in response to each. Officers have reviewed the Examiner's Report and agree with all the recommendations and the reasons for them.
- 3.2 The Council is required to consider whether the draft SNDP meets the basic conditions, is compatible with the Convention rights and complies with the definition of an NDP and the provisions that can be made by a NDP or can do so as modified.
- 3.3 Officers have carefully considered the SNDP and the Examiner's report and consider that:
 - 3.3.1 The SNDP, as modified by the Examiner's recommendations, has had regard to national policies and advice contained in guidance issued by the Secretary of State. The SNDP has been assessed against the National Planning Policy Framework and national Planning Practice Guidance and modifications proposed to comply with national policy.

- 3.3.2 The SNDP, as modified by the Examiner's recommendations, contributes to the achievement of sustainable development. The SNDP has been subject to sustainability assessment that identifies the plan will have an overall positive effect.
 - 3.3.3 The SNDP, as modified by the Examiner's recommendations, is in general conformity with the strategic policies contained in the development plan as a whole for the area. The SNDP has been assessed against the adopted Stroud District Local Plan and modifications proposed to ensure the SNDP does not become out-of-date in the context of a review of strategic policies in the Local Plan.
 - 3.3.4 The SNDP, as modified by the Examiner's recommendations, would not breach, and be otherwise incompatible with EU obligations. The Examiner's assessment has involved considering the following Directives: the Strategic Environmental Assessment Directive (2001/42/EC); the Environmental Impact Assessment Directive (2011/92/EU); the Habitats Directive (92/43/EEC); the Wild Birds Directive (2009/147/EC); the Waste Framework Directive (2008/98/EC); the Air Quality Directive (2008/50/EC); and the Water Framework Directive (2000/60/EC). In addition, no issue arises in respect of equality under general principles of EU law or any EU equality directive. The Council issued a Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Determination in January 2023, which confirmed to Slimbridge Parish Council that a SEA and a full HRA were not required on the SNDP.
 - 3.3.5 The SNDP, as modified by the Examiner's recommendations, would not give rise to significant environmental effects on European sites and European offshore marine sites. The Council issued a Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Determination in January 2023, which confirmed to Slimbridge Parish Council that a SEA and a full HRA were not required on the SNDP.
 - 3.3.6 The SNDP, as modified by the Examiner's recommendations, is in all respects fully compatible with Convention rights contained in the Human Rights Act 1988. The Examiner considered the Convention's Articles 6(1), 8 and 14 and its First Protocol Article 1. Nothing in his examination of the Draft SNDP indicated any breach of a Convention right. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known.
 - 3.3.7 The SNDP, as modified by the Examiner's recommendations, complies with the definition of an NDP and the provisions that can be made by a NDP. The SNDP sets out policies in relation to the development and use of land in the whole of the neighbourhood area; it specifies the period for which it is to have effect; it does not include provision about development that is 'excluded development' and does not relate to more than one neighbourhood area or repeat an existing planning permission.
- 3.4 Subject to consideration at the meeting, members are asked to authorise officers to make the modifications specified in the Examiner's Report and progress the modified version of the plan to a referendum.
- 3.5 The neighbourhood area matches the civic boundary of Slimbridge Parish; officers recommend that the referendum area should remain that of the Slimbridge Neighbourhood

Area, as designated by the Council on 23rd July 2020. However, the Council cannot make a decision that differs from the examiners' recommendations about the referendum area.

- 3.6 The Council must publish a statement setting out its decision and the reason for making it. The qualifying body will need to modify the plan and produce a final version for the referendum.
- 3.7 The Council must hold a referendum within 56 working days from the date that the decision to take the plan forward to a referendum is published. In consultation with the Council's returning officer and elections department, May 2024 has been identified as the suitable date for holding a referendum.
- 3.8 If the plan passes referendum, the Council is required to make (adopt) it unless it breaches EU or Human Rights legislation. The Council's scheme of delegation does not delegate this decision to officers or the Environment Committee, so the decision to make the plan will be made by full Council. This decision is expected to take place in July 2024. The plan cannot be modified at that stage.

4. Implications

4.1 Financial Implications

There are no direct financial implications arising from this recommendation. Not to accept the recommendations could lead to costs associated with legal challenge.

Adele Rudkin, Accountant

Tel: 01453 754109 Email: adele.rudkin@stroud.gov.uk

4.2 Legal Implications

Following the independent examination of the neighbourhood plan and after the examiner's report has been received, the Council must come to its formal view on whether the draft neighbourhood plan meets the 'basic conditions'. Only a draft neighbourhood plan that meets each of the basic conditions can be put to a referendum and be made. The basic conditions are set out in [Paragraph 8\(2\) of Schedule 4B to the Town and Country Planning Act 1990](#) as applied to neighbourhood plans by Section 38A of the Planning and Compulsory Purchase Act 2004. These are:

- a. Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan. This includes the NPPF.
- b. The making of the neighbourhood plan contributes to the achievement of sustainable development. The plan should contribute to improvements in environmental, economic and social conditions or that consideration has been given to how any potential adverse effects arising from the proposals may be prevented, reduced or offset.
- c. The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the Council's area.
- d. The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations. There are 4 Directives that may be of particular relevance to neighbourhood planning namely, the Strategic Environmental Assessment (SEA) Directive, the Environmental Impact Assessment (EIA) Directive, the Habitats Directive and the Wild Birds Directive
- e. Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. These

include not breaching the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017, which set out the habitat regulation assessment process for land use plans, including consideration of the effect on habitats sites.

The Council must consider the examiner's report to ensure that the neighbourhood plan meets the basic conditions and to determine whether or not it should proceed to referendum, with or without modifications. Unless otherwise agreed with the qualifying body, this decision must be made within 5 weeks of the Council receiving the examiner's report.

If the Council decides that the neighbourhood plan meets the basis conditions or would meet those conditions if modifications were made to the plan (whether or not recommended by the examiner) then a referendum must be held.

Martin Evans Locum Planning Lawyer, One Legal
Tel: 01684 272227 Email: legalservices@onelegal.org.uk

4.3 Equality Implications

As part of the Examination process the plan was found to meet the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. A requirement of meeting these conditions is that the plan must be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

No Equality Impact Assessment has been carried out.

4.4 Environmental Implications

The Neighbourhood Plan General Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required. In order to comply with this requirement, Stroud District Council (SDC) undertook a screening exercise in January 2023 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. As a result of this process SDC concluded that the Plan is not likely to have any significant effects on the environment and accordingly would not require an SEA.

SDC also prepared a Habitats Regulations Assessment (HRA) of the Plan. It concludes that the neighbourhood plan will not give rise to likely significant effects on European sites, either alone or in combination with other plans or projects, and that Appropriate Assessment is not required.

As part of the Examination process the plan was found to meet the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. A requirement of meeting these conditions is that the plan must contribute to the

achievement of sustainable development and not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 (7).

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Slimbridge Parish Neighbourhood Development Plan 2022-2040

Submission Version

A Report to Stroud District Council on the Examination of the Slimbridge
Parish Neighbourhood Development Plan

John Slater BA (Hons), DMS, MRTPI, FRGS

John Slater Planning Ltd

15th January 2024

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Executive Summary

My examination has concluded that the Slimbridge Neighbourhood Development Plan should proceed to referendum, subject to the Plan being amended in line with my recommended modifications, which are required to ensure the plan meets the basic conditions. The more noteworthy include –

- Removing the reference to the maintenance and management of watercourses from the policy, as it does not constitute “development”.
- All areas at risk of flooding should be mapped and the policy should refer to new development being subject to a sequential test and, if necessary, passing the exception test, if it is to be located in an area at risk of flooding.
- Changing the retrofitting policy to “encourage” the meeting of the LETI Climate Emergency Retrofit Guide targets and these targets to be included as an appendix to the plan.
- Including within the natural capital and ecosystems policies, examples of how householders can adopt measures to improve their performance and removing reference to the national biodiversity net gain policy.
- Including better information showing the location of the three ancient willow trees and also the deciduous woodland at the Slimbridge Wetland Centre. Removing the requirement that new tree planting should be justified by ecological and arboricultural assessment.
- Including the need to assess “cumulative impact” when considering new renewable energy developments.
- Removing the requirements to achieve water efficiency targets.
- Deleting the policy regarding pre-application consultation.
- Providing insets plan showing the location and extent of each local green space.
- Providing clarification as to the working from home policy.
- Allowing new tourism businesses within well-designed new buildings as well as building conversions.
- Removing The Nest as a non-designated heritage asset and clarifying the extent of the local listing in respect of the Gloucester and Sharpness Canal.

The referendum area does not need to be extended beyond the Plan area.

Introduction

1. Neighbourhood planning is a process, introduced by the Localism Act 2011, which allows local communities the opportunity to create the policies that will shape the places where they live and work. A neighbourhood plan does provide the community with the ability to allocate land for particular purposes and to prepare the policies that will be used in the determination of planning applications in its area. Once a neighbourhood plan is made, it will form part of the statutory development plan alongside the policies in the Stroud Local Plan, adopted in November 2015. Decision makers are required to determine planning applications in accordance with the development plan, unless material considerations indicate otherwise.
2. The neighbourhood plan making process has been undertaken under the supervision of Slimbridge Parish Council. A Steering Group was appointed to undertake the Plan's preparations.
3. This report is the outcome of my examination of the Submission Version of the Slimbridge Neighbourhood Development Plan. My report will make recommendations, based on my findings, on whether the Plan should go forward to a referendum. If the Plan then receives the support of over 50% of those voting at the referendum, the Plan will be "made" by Stroud District Council.

The Examiner's Role

4. I was appointed by Stroud District Council in October 2023, with the agreement of Slimbridge Parish Council, to conduct this examination.
5. In order for me to be appointed to this role, I am required to be appropriately experienced and qualified. I have over 45 years' experience as a planning practitioner, primarily working in local government, which included 8 years as a Head of Planning at a large unitary authority on the south coast, but latterly as an independent planning consultant and director of my neighbourhood planning consultancy, John Slater Planning Ltd. I am a Chartered Town Planner and a member of the Royal Town Planning Institute. I am independent of Stroud District Council and Slimbridge Parish Council and I can confirm that I have no interest in any land that is affected by the Neighbourhood Plan.

6. Under the terms of the neighbourhood planning legislation, I am required to make one of three possible recommendations:
 - That the Plan should proceed to referendum on the basis that it meets all the legal requirements.
 - That the Plan should proceed to referendum, if modified.
 - That the Plan should not proceed to referendum on the basis that it does not meet all the legal requirements.
7. Furthermore, if I am to conclude that the Plan should proceed to referendum, I need to consider whether the area covered by the referendum should extend beyond the boundaries of the area covered by the Slimbridge Neighbourhood Plan area.
8. In examining the Plan, the Independent Examiner is expected to address the following questions:
 - Do the policies relate to the development and use of land for a Designated Neighbourhood Plan area in accordance with Section 38A of the Planning and Compulsory Purchase Act 2004?
 - Does the Neighbourhood Plan meet the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 - namely that it specifies the period to which it is to have effect? It must not relate to matters which are referred to as “excluded development” and also that it must not cover more than one Neighbourhood Plan area.
 - Has the Neighbourhood Plan been prepared for an area designated under Section 61G of the Town and Country Planning Act 1990 and been developed and submitted by a qualifying body?
9. I am able to confirm that the Plan, if amended in line with my recommendations, only relates to the development and use of land, covering the area designated by Stroud District Council, for the Slimbridge Neighbourhood Plan, on 23rd July 2020.
10. I can also confirm that it does specify the period over which the Plan has effect, namely the period from 2020 up to 2040.
11. I can confirm that the Plan does not contain policies dealing with any “excluded development”.
12. There are no other neighbourhood plans covering the area covered by the neighbourhood area designation.
13. I am satisfied that Slimbridge Parish Council as a parish council can act as a qualifying body under the terms of the legislation.

The Examination Process

14. Once I had reviewed the submitted documents, my first task was to conduct a site visit to Slimbridge. That was carried out on Wednesday 16th November 2023.

Appendix A

15. I entered the parish from the north, along the A38, through Cambridge, before turning right at the Slimbridge roundabout and into the village. I initially orientated myself by driving through the village and turning around just before the canal. Travelling back through the village, I saw the Post Office, St John's Church, the Village Hall, the cemetery, the Social Club, the playing fields and sports pavilion before passing the school. I then crossed the roundabout and turned left into Dursley Road, passing the football club and the Wisloe Stables. I was able to gauge the likely changes to this part of the parish, that would result from the inclusion of the proposed new settlement in the Local Plan, before entering Cambridge, where I noted the location of both the Showground and The Green.
16. Passing through Cambridge, down Ryalls Lane to the canal, I then returned to Slimbridge via Longaston Lane. On my tour, I recognised a number of the key views, particularly those along the canal and the long distant views of the tower of St John's. I then explored the western side of the parish, taking in Moorend, Hurst Farm and Gossington. I returned to Slimbridge and finished my tour with a visit to the Slimbridge Wetland Centre.
17. Upon my return from Gloucestershire, I prepared the document entitled Initial Comments of the Independent Examiner, dated 20th November 2023, which asked questions of both the Parish Council and Stroud District Council. In that note, I expressed my view that the examination would not need a public hearing and that remains the case.
18. I received the response from Slimbridge Parish Council on 5th December 2023 and from Stroud District Council, on 8th December 2023. Both responses were placed on the appropriate websites.

The Consultation Process

19. The preparation of a neighbourhood plan was initially prompted by concerns regarding a potential development at Wisloe Green.
20. After the application had been submitted by the Parish Council for neighbourhood area status, a Steering Group was set up and workshop sessions were held with the Gloucestershire Rural Communities Council. In September 2020, an initial questionnaire was circulated with the parish newsletter, which generated 61 responses, showing strong support for the preparation of a neighbourhood plan. One of the working groups took on the task of preparing a community questionnaire, which was finally circulated in March 2021. This was responded to by 40% of the households, but only six businesses replied. Its results were reported in May 2021. Between May and July 2021, drop in events were held in the Village Hall and also the Churchyard and the Forge.

21. A housing needs survey was commissioned and face-to-face meetings were held with local businesses in the summer of 2021. The Steering Group also attended the Slimbridge Flower Show and the Slimbridge Heritage Weekend as well as a Village Hall coffee morning held in December 2021.
22. In addition to the specific events, the work on the neighbourhood plan was publicised via the Parish Council website, its Facebook pages and the Slimbridge, Cambridge and Gossington Village Forum as well as through regular articles in the village newsletter.
23. A Pre-Submission version of the neighbourhood plan was published, which was subject to what was known as a Regulation 14 consultation, which ran from 23rd February 2023 to 5th March 2023. This consultation produced 68 responses. Some changes to the document were made and these are shown on the document Post Regulation 14 Key Revisions shown on the Parish Council website.
24. I am very satisfied that the community has had ample opportunity to be consulted and to be able to influence the content of this neighbourhood plan despite the constraints imposed by the Covid pandemic.

Regulation 16 Consultation

25. I have had regard, in carrying out this examination, to all the comments made during the period of final consultation, which took place over a six- week period, between 18th September 2023 and 30th October 2023. This consultation was organised by Stroud District Council, prior to the Plan being passed to me for its examination. That stage is known as the Regulation 16 consultation.
26. In total, 15 responses were received, including: Stroud District Council, National Highways, Historic England, Gloucestershire County Council, Environment Agency, Wisloe Project Team, Ernest Cook Trust, Gloucestershire Wildlife Trust, Severn Trent, Natural England and Network Rail. I also received 3 representations from local residents plus a letter of commendation submitted by the Chair of the Slimbridge NDP Steering Group.
27. I have carefully read all the correspondence and I will refer to the representations where relevant to my considerations and conclusions in respect of specific policies or the Plan as a whole.

The Basic Conditions

28. The Neighbourhood Planning Examination process is different to a Local Plan Examination, in that the test is not one of “soundness”. The Neighbourhood Plan is tested against what are known as the Basic Conditions as set down in legislation. It will be against these criteria that my examination must focus.

Appendix A

29. The five questions, which seek to establish that the Neighbourhood Plan meets the basic conditions test, are: -

- Is it appropriate to make the Plan having regard to the national policies and advice contained in the guidance issued by the Secretary of State?
- Will the making of the Plan contribute to the achievement of sustainable development?
- Will the making of the Plan be in general conformity with the strategic policies set out in the Development Plan for the area?
- Will the making of the Plan breach or be otherwise incompatible with EU obligations or human rights legislation?
- Will the making of the Plan breach the requirements of Regulation 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017?

30. On 19th December 2023, the Secretary of State published a new version of the National Planning Policy Framework. However paragraph 230 of the new Framework states that for the purpose of examining plans, where the plan has reached pre – submission consultation stage before 19th March 2024, the examination will be examined against the policies in the relevant previous version of the Framework, which is the NPPF published on 5th September 2023. All references to the NPPF in this report will refer to that version of the Framework, unless otherwise stated.

Compliance with the Development Plan

31. To meet the basic conditions test, the Neighbourhood Plan is required to be in general conformity with the strategic policies of the Development Plan, which in this case is the Stroud District Local Plan, which was adopted in November 2015. This covers the period 2015 to 2031
32. Policy CP2 includes a presumption that housing development will take place within settlement development limits for the areas outside the strategic sites.
33. Policy CP3 sets the settlement hierarchy. Slimbridge is included within the third tier of settlements - Accessible Villages with Limited Facilities, which are described as villages possessing a limited level of facilities and services, which together with local employment, provide the best opportunities, outside the local service centres, for greater self-containment. They will provide for lesser levels of development in order to safeguard their role and offer neighbourhood plans some opportunities for growth and to deliver affordable housing. These are all strategic policies.

34. Cambridge is included within the fourth tier of settlements known as Accessible Settlements with Minimal Facilities, where development will be limited to that needed to help meet the housing needs assessment and to improve employment opportunities, services and facilities
35. Slimbridge falls within the Berkeley Cluster. Policy HC1 supports residential development within defined settlement development limits, subject to meeting 9 criteria. Policy HC4 covers rural exception sites which can be supported outside but adjacent, to third tier settlements.
36. Stroud District Council is currently preparing a Local Plan Review which will take the local plan through the period up to 2040. The draft local plan has reached its examination stage. That examination was paused for a summer break in June 2023 and the Inspectors raised concerns regarding two allocations, including the proposed Wisloe Garden Village as well as the wider Strategic Road Network. The District Council is working with National Highways, South Gloucestershire Council and the County Council to address these issues and it has requested a six month pause to undertake a Joint Action Plan. It is anticipated that the examination will recommence in 2024 and the local plan is likely to be adopted, either in late 2024 or 2025.
37. In this draft plan, Slimbridge is a Tier 3b) settlement, a medium sized village with no retail or employment role, but a good basic level of community facilities and services. Cambridge is now classed as a Tier 4a) settlement, a small settlement with no retail role and minimal local services and facilities, but is well connected to Slimbridge's services. Both are shown as having a settlement boundary.
38. That plan's spatial strategy includes a large-scale new settlement known as Wisloe Garden Village, mainly within the parish, which will provide approximately 1500 homes, and other associated facilities including employment space.
39. I can attach little weight to the emerging policies, both in terms of the basic conditions which relate to general conformity with strategic policies in the adopted local plan, but also that the Wisloe settlement proposals are the subject of ongoing objections and the need to resolve matters that demand further work, before the Inspectors are in a position to pronounce upon the planning merits of that part of the strategy.
40. My overall conclusion is that the Neighbourhood Plan is in general conformity with the strategic policies in the adopted Stroud Local Plan.

Compliance with European and Human Rights Legislation

41. Stroud District Council issued a Screening Opinion, dated 17th November 2023 which concluded, having consulted with the three statutory consultees, that a full strategic environmental assessment, as required by EU Directive 2001/42/EC which is enshrined into UK law by the

Appendix A

“Environmental Assessment of Plans and Programmes Regulations 2004”, would not be required.

42. The District Council, as competent authority, issued a screening under the Habitat Regulations, in the same letter. This agreed with the assessment of Natural England that the plan is unlikely to have any significant adverse effects on European Protected sites.
43. I am satisfied that the basic conditions regarding compliance with European legislation, including the 2017 introduced basic condition regarding compliance with the Habitat Regulations, are met. I am also content that the plan has no conflict with the Human Rights Act.

The Neighbourhood Plan: An Overview

44. I must firstly commend the Parish Council and the Steering Group for the amount of work that has been put into this neighbourhood plan exercise, bearing in mind that the Parish Council only commenced work on a neighbourhood plan for Slimbridge in 2020 and that there has been an intervening global pandemic to deal with.
45. This is a neighbourhood plan that is very firmly focused on the parish of Slimbridge. It seeks to produce planning policy covering the matters that are important to the community, such as protecting its community facilities, its heritage and landscape. It does not have to make any housing allocations.
46. Running parallel to this plan is the work on the new local plan which is now at its public examination, albeit that has been paused. Notwithstanding the neighbourhood plan’s planning policies, the emerging local plan has the potential to significantly change the nature of this parish, especially to the east of the A38, with the Wisloe Garden Village proposal. Thankfully I do not have to consider the implications of that strategic allocation. However, once the new local plan is adopted, the Parish Council may wish to revisit this neighbourhood plan, to consider whether the policies need to be updated to reflect the new strategic policy context.
47. I am satisfied that this plan, when taken as a whole will deliver sustainable development. It has policies that encourage employment, protects community facilities and open spaces, protects the parish’s heritage and its natural environment and valued views. It encourages the retrofitting of existing buildings to be more energy efficient. The plan sets high expectations in terms of design and I would highlight the Design Guidance section of the Parish’s Design Statement which picks up features that will help inform the design approach of any new development.

48. A number of the polices have sought to address matters that go beyond how a planning application is to be determined. The neighbourhood plan legislation is clear that a neighbourhood plan policy should be a policy for the use and development of land, to be used to determine planning applications. I have made a number of recommendations to ensure the policies do not extend beyond that remit, as on occasion they have extended into how applications should be prepared or what pre-application engagement is required. These have a place in the neighbourhood plan document but cannot be used to decide whether a planning application should be approved or refused. Much of the policy wording I have recommended for deletion could find a place in the supporting text.
49. My examination has concentrated on the plan policies and their wording and whether the plan as a whole meets the basic conditions, as well as the other legal tests. It is beyond the scope of my role as examiner to have to re-draft the supporting text. However, there will be a need for an editing exercise, in view of the changes that I am recommending, to ensure that the resultant plan reflects my recommendations, yet still reads as a cogent and coherent planning document. In a number of instances I have made recommendations relating to the mapping intended to improve the clarity and utility of the maps in supporting decision making.
50. I will leave it to the Parish Council to work alongside the District Council planners to make these consequential changes to the supporting text and justifications, when preparing the Referendum Version of the plan, which will have to be published alongside Stroud District Council's Decision Statement.

The Neighbourhood Development Plan Policies

Policy SCE1: Natural Flood Management in Slimbridge Parish

51. The first two paragraphs refer to the important role played by natural flood management in conserving and enhancing the ecological flood storage value of the parish's water environment and it refers to the importance of the management and keeping in good condition, its watercourse corridors.
52. Whilst these are important statements, the carrying out of maintenance or management does not fall within the definition of development, which is the overarching remit of a neighbourhood plan policy. Accordingly, whilst these statements can be included within the supporting text or refer to in the Practical Projects section of the document, they cannot be a policy dealing with the use and development of land.

Appendix A

53. The policy does go on to refer to areas of known surface water flooding. This includes the areas identified in Figure 3a and 3b which show the Environment Agency's risk of surface water flooding maps and the recorded flood outline. But the policy also refers to the River Cam and Lightenbrook catchment areas. It is important that a decision maker and indeed an applicant, knows the extent of these two watercourses' catchment areas, so as to be confident whether a site is one at a risk of surface water flooding or not.
54. The NPPF refers to sites which are a risk of all types of flooding. In addition to Figures 3a and 3b, I will recommend the Parish Council included in this section of the plan, a map showing the River Cam and Lightenbrook catchment areas. Within areas at risk of flooding new development will be expected, so that a sequential test and if necessary the exception test, can be applied to all development in these areas at risk of flooding, as set out in the Planning and Flood Risk section of the NPPF. If necessary, proposals should include appropriate mitigation and construction methods should be adopted to ensure that development is safe for its lifetime.

Recommendations

Delete the first two paragraphs of the policy and move to the supporting text.

Include a map showing the River Cam and Lightenbrook catchment area as Figure 3c.

Replace all the text in the third paragraph after "flooding issues" with "as shown in Figures 3a, 3b and 3c shall be subject to a sequential test, other than for minor development and changes of use, to avoid placing people and property at risk from flooding, in accordance with the requirements set out in paragraphs 159- 169 of the NPPF (the version issued on 5th September 2023) and, where permitted, should include appropriate mitigation and construction methods".

Policy SCE2: Retrofitting of Existing Buildings to Improve Energy Efficiency

55. The emphasis on this policy is offering "encouragement" and hence it does not undermine the Secretary of State's requirement that neighbourhood plans should not impose additional technical standards, in terms of construction, performance and layout of new dwellings.
56. The final paragraph could be interpreted as more than encouragement through the use of phrase "should seek to incorporate". I will propose explicitly to only "encourage" the meeting of these targets, which are unfortunately not included in the policy. I sought clarification of what these targets required, in my Initial Comments and I was directed to the targets set out in page 13 of the LETI Climate Emergency Retrofit

Guide document. I will recommend that this table be incorporated into the plan as an appendix, which can be referred to in the policy.

57. On 13th December 2023, a new Written Ministerial Statement from the Minister of Housing stated that “Any planning policies that propose local energy standards for buildings that go beyond current or planned building regulations should be rejected at examination” if they go beyond a well – reasoned costed rationale that covers viability, impact on housing supply and affordability and expressing the additional requirements as a percentage uplift of the targeted Emissions Rate calculated using the Standard Assessment Procedure.
58. However as the policy as amended would be only one of encouragement and is restricted to existing buildings, I am content to retain it, as a planning application could not be refused for failing to meet these targets.

Recommendations

***In the final paragraph replace “should seek” with “are encouraged” and insert at the end “as set out in Appendix A”
Insert at the end of the plan document, Appendix A and then include the following table***

SIGNPOST Chapter 4 - LETI home retrofit targets - 4.3 Constituent element method			LETI best practice		LETI exemplar
Building element		Retrofit actions	Constrained retrofit	Unconstrained retrofit (cool temperate climate)	All retrofit types
Walls	Cavity	External, cavity or Internal insulation	0.24 w/m².K	0.18 w/m².K	0.15 w/m².K
	Solid uninsulated	External or Internal insulation	0.32 w/m².K	0.18 w/m².K	0.15 w/m².K
	Timber frame	External or Internal insulation	0.21 w/m².K	0.18 w/m².K	0.15 w/m².K
Roofs	Cold	Insulate	0.12 w/m².K	0.12 w/m².K	0.12 w/m².K
	Warm/flat	Insulate	0.22 w/m².K	0.12 w/m².K	0.12 w/m².K
Floors	Suspended timber	Insulate between joists	0.20 w/m².K	0.18 w/m².K	0.15 w/m².K
	Solid uninsulated	Excavate and insulate below	0.80 w/m².K	0.15 w/m².K	0.15 w/m².K

Windows and doors	Windows	Replace	1.30 w/m².K	1.00 w/m².K	0.80 w/m².K
	Doors	Replace	1.00 w/m².K	0.80 w/m².K	0.80 w/m².K
General envelope	Thermal bridging	Mitigate where possible	0.10 w/m.K	0.10 w/m.K	0.08 w/m.K
	Airtightness	Draught proofing, sealing of chimneys and vents	3.0 ach@50Pa	2.0 ach@50Pa	1.0 ach@50Pa
Systems	Systems and appliances	Fossil fuel free home	Fossil fuel free	Fossil fuel free	Fossil fuel free
	Ventilation type	Install and remove extract fans	MVHR*	MVHR	MVHR
	Lighting power	Replace lamps and fittings	50 lm/W	100 lm/W	100 lm/W
Hot water	Hot water tank	Increase insulation or replace	1.5 w/K	1.5 w/K	1.5 w/K
	Primary pipework	Insulate all pipework	90% of pipework insulated	90% of pipework insulated	90% of pipework insulated
	Shower demands	Low flow fittings	16 litres/pers.day	16 litres/pers.day	16 litres/pers.day
	Other demands	Low flow fittings	9 litres/pers.day	9 litres/pers.day	9 litres/pers.day
Renewables	Photovoltaic generation	Rooftop installation	0 % of roof area covered in PV panels	40 % of roof area covered in PV panels	40 % of roof area covered in PV panels

Policy SCE3: Natural Capital and Ecosystem Services

59. I have no concerns with the overall ambition of this policy, which I believe is in line with the policies as set out in the NPPF.
60. A neighbourhood plan policy cannot dictate what documents are required to accompany a planning application. That is a matter for the District Council's Local Validation List. I would recommend that the wording be changed to "applications will be expected to demonstrate," which will have the same effect
61. I did raise the question as to whether the scope of the policy intent would, for example, be reasonable in terms of domestic development. I found that examples set out in the Parish Council's response convincing and I will recommend that these examples are added to

supporting text, as positive examples to demonstrate how a householder could address the aspirations of the policy.

62. The final paragraph, requiring compliance with the national policy on biodiversity net gain, is unnecessary as this will shortly be a legal requirement on all eligible development. I propose this element of the policy be deleted.

Recommendations

At the end of the bullet points in the first paragraph insert

“Possible actions related to householder planning application could include some of the following: -

- ***Install green roofs or rain-gardens to capture, filter and manage excess water;***
- ***Create new habitats on site, including ponds and bog gardens to deal with heavy rain fall;***
- ***Use permeable surfacing;***
- ***Increase areas of planting including. a diverse mixture of native species to intercept surface water;***
- ***Create a compost heap to compost waste and improve soils;***
- ***Create new habitats including; ponds, bog gardens, areas with log piles and long grass;***
- ***Create new wildlife friendly linear features (e.g. native, mixed-species hedgerows) particularly along the edges of roads, to improve air quality;***
- ***Select plants to provide a variety of food for wildlife e.g. nectar rich/berries/grasses;***
- ***Protect and retain existing mature trees, especially orchard trees;***
- ***Increase tree cover with local orchard species;***
- ***Minimise areas of heavily managed amenity grass considering using wildflower and meadow mixes on less intensively used areas.”***

In the second paragraph replace” must be supported by a statement that sets out” with “should demonstrate”

Delete the final paragraph.

Policy SCE4: Trees, Woodland s and Hedgerows

63. This policy, in respect of ancient and veteran trees, goes beyond national policy guidance, which is that these trees should only be lost if there are “wholly exceptional reasons and a suitable compensation strategy exists”. I propose that this caveat be introduced into the neighbourhood plan policy.
64. In terms of the identified veteran trees, I did not find it easy to identify the trees which are to be treated as ancient trees from the row of trees standing beside the canal. The Parish Council have reassured me that they are included on the Woodland Trust Ancient Tree Inventory. I have

Appendix A

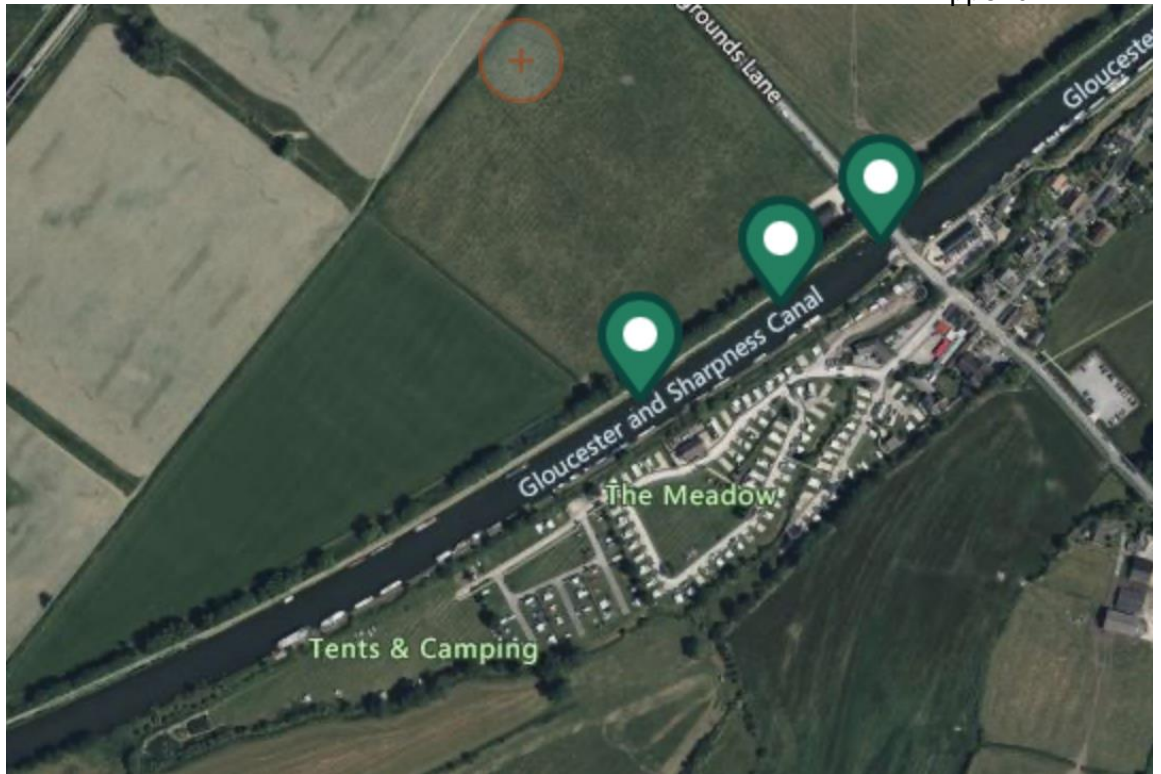
interrogated that website and it appears to show far more accurate locations of the 3 veteran trees, than is shown in Figure 7. I propose that the attached screenshot should be included in the document to reflect more accurately in the location of the trees in question, as an inset. I will also recommend that the map references be introduced to the key.

65. Stroud District Council has pointed out that the requirements in the policy actually go beyond the requirements set out in BS5837. I therefore propose to remove reference to the width of the buffer and root protection areas as these are covered in BS5837 document – Trees in Relation to Design, Demolition and Construction. I am also proposing to remove reference to hedgerows, as none are identified on either of the maps.
66. I was also concerned regarding the legibility of the Priority Habitat Inventory- Deciduous Woodland in relation to the Slimbridge Wetland Centre. I have interrogated the MAGIC website and have been able to identify, by zooming in on the database, the precise areas. I consider that it would be helpful to include that as an inset plan.
67. Finally, in terms of new tree planting, I do not consider that is a proportionate requirement to oblige applicants to carry out ecological and arboricultural assessments to justify new tree planting.

Recommendations

At the end of the first paragraph, after “resisted” insert “except where there are wholly exceptional reasons and a suitable compensation strategy exists”

In the key of Figure 7 after “Veteran Tree - willow” insert “at Map references SO 72759 04247; SO 72689 04204; SO 72591 04139: See inset for a more accurate location of the ancient trees”



Insert the following inset map to show the extent of deciduous woodland around the Slimbridge Wetland Centre



***Delete the second paragraph.
Amend the second title to read “Other existing Trees and Woodland”
In the first sentence of the third paragraph of the policy, delete “and hedgerows”
Under the title New Trees, omit all the text in the final paragraph after “supported”***

Policy SCE5: Renewable or Low Carbon Energy Generation in Slimbridge parish

68. The relevant section of the NPPF (paragraph 155) refers to policy maximising the potential suitable development in the field of renewable or low carbon energy, whilst ensuring that adverse impacts are appropriately addressed, including cumulative impact. I will therefore include reference to “cumulative impact” in my recommendation to bring into line with Secretary of State policy.

Recommendation

After “environmental impacts” insert “including cumulative impact”

Policy SD1: Locally Distinctive, High Quality Design

69. Stroud District Council in its Regulation 16 comments, asserted that the National Model Design Code is not a design code, but is guidance to help the production of design codes. However the National Design Guide includes in paragraph 3 “this National Design Guide and the National Model Design Guide and Guidance Note for Design Codes illustrates how well-designed places that are beautiful, healthy, greener, and enduring and successful, can be achieved in practice.” I therefore do not need to recommend that, the reference to the National Model Design Code, be removed but I will add in the reference to the National Design Guide.
70. The Secretary of State in a Written Ministerial Statement to the House of Commons dated 25th March 2015, stated that neighbourhood plan “should not set any additional technical standards or requirements related to the construction, internal layout or performance of new dwellings”. The Parish Council has confirmed that it is not its intention to mandate requirements beyond the Building Regulations, but rather it seeks to encourage the highest possible energy performance. I therefore propose an amendment that reflects the concept of the “encouragement” of these highest standards.
71. The final paragraph imposes water efficiency requirements. Again, the Secretary of State advice is that any requirements for compliance with national technical standards with regard to water efficiency can only be imposed by a local plan policy, rather than a neighbourhood plan.

Recommendations

After “National Model Design Code” insert “, the National Design Guide”

Replace the third paragraph with “Developments are encouraged to be designed to reduce carbon emissions and energy demand. High standards of sustainable design and construction will be supported. Both new build and refurbishment of existing homes are encouraged to meet the energy use targets as set out in the Net Zero Carbon Toolkit (2021)”.

Delete the final paragraph of the policy.

Policy SD2: Pre - application Community Engagement

72. Whilst I fully applaud the intention behind this policy, unfortunately it does not meet the requirements of what a neighbourhood plan policy should be, namely a policy for the use and development of land, which can be used to *determine* a planning application. Essentially the proposed policy covers “process” matters i.e. how a planning application is developed and prepared including pre-application consultation. I fully accept that this is good practice which can be highlighted in the neighbourhood plan document, but it is not a policy which sets out how a planning application should be determined. I recommend that, as a policy, it should be deleted but it can remain a permanent part of the neighbourhood plan document, including the pre-application protocol.

Recommendation

The policy be deleted.

Policy SD3: Sustainable Development to Meet Local Housing Need

73. I only have one minor concern and that is that the policy states that schemes that meet local housing need will only be supported *in principle*. One of the requirements of a plan, as set out in paragraph 16 of the NPPF, is that plans should “be prepared positively” and be “clearly written and unambiguous, so it is evident how a decision maker should react to a development proposal.” If the proposal meets requirements of the development plan, then it should be approved without introducing “wriggle room”, which is implied by offering only support “in principle”.

Recommendation

Delete “in principle”

Policy SLW1: Community Facilities

74. The Parish Council has confirmed that the proposal only has to meet one of the three criteria are set out and I will call you recommend it, in the interest of clarity, that “and/or” should be replaced with “or”.

Recommendation

In the first two bullet points replace “and/ or” with “or”

Policy SLW2: Local Green Space

75. I have no issues with the selection of the six proposed local green spaces, which I believe have been amply justified in the Slimbridge Parish Local Green Space Report. However the scale of the map and Figure 10 is too small for the boundaries of the proposed local green space to be established, with clarity and indeed it is impossible to identify the location of the Gossington Green because of the map’s scale. I would recommend

Appendix A

that detailed inset plans should be included showing the extent of the identified spaces.

76. I believe the policy meets the basic conditions.

Recommendation

Insert individual site plans showing the extent of each local green space

Policy SLW3: Getting Around

77. I have no concerns with the policy, especially as it recognises the connections to the public rights-of-way network should only be required “where it is appropriate”. The making of contributions to the wider public rights-of-way is encouraged and as such any payment made pursuant to a planning obligation will be expected to have to meet the requirements of Regulation 122 of the Community Infrastructure Levy Regulations 2010.

Policy SLW4: Local Economy

78. I have no comments to make on this policy as it recognises the limits of the policy to prevent the loss of commercial premises, to residential use under permitted development rights.

79. I was initially concerned with the idea of commercial space at residential properties. The Parish Council clarified that the test would be whether other persons, who are not resident in the property, use it as their place of work. They also referred to where people visit the premises for services such as dance studios or a creche. However a policy, by itself, cannot dictate whether the planning permission is required. For example, childminders can use their homes for up to a certain number of children without needing permission. Similarly professional people may offer, for example, home tutoring or health treatments - which do not amount to a material change of use. I propose to clarify it, by reference, to “where planning permission is required) as suggested by the Parish Council although some uses may well fit within Use Class E.

Recommendation

Replace the second sentence with “Where planning permission is required, any proposal for small scale development that falls within Use Class E will be supported where;

- ***There will be no unacceptable impact on the amenities of residential properties in the immediate locality; and***
- ***Measures to mitigate any adverse impact of traffic generation, noise and odours are included, where required”***

Policy SLW5: Managing Tourism and Rural Diversification in Slimbridge Parish

80. This policy, as submitted, “only allows new or improved tourist accommodation to be located by reusing existing buildings”. This is contrary to the expectations of the Secretary of State, in paragraph 84 of the NPPF, which also expects plans to support “well designed new buildings”. This

change has been accepted by the Parish Council in its response to my Initial Comments.

Recommendation

In the second bullet replace “where appropriate” with “or well-designed new buildings”

Policy SLH1: Locally Valued Key Views

81. I have no concerns regarding the identification of the locally chosen key views and then I have no other comments in terms of the expectations of the policy.

Policy SLH2: Heritage Assets and Archaeology

82. The first part of the policy is a requirement that proposals comply with the principles set out in the existing local plan policy, which will already apply to Slimbridge Parish. Essentially this a policy requiring compliance with another policy. This is unnecessary duplication, contrary to Secretary of State advice in paragraph 16f) of the NPPF.
83. The second element deals with the areas with potential for archaeological remains. It refers to an area around Lightenbrook, Lynch Field and Stanborough Mead. I will recommend that the extent of the area of special interest is shown on a map to be included within the plan, as two of these areas of special interest are not identified on ordnance survey maps or in the plan and a decision maker may not have the local knowledge to know whether the heightened potential for finding Roman and Iron Age remains, is relevant to their site, requiring particular investigation.
84. The final element to the policies, setting an expectation that applicants refer to the Local Heritage Report and engage with the County Council and other archaeologists is essentially a “process matter” rather than a policy to be used to determine a planning application. It can be moved to the supporting text rather than included with the policy. I am advised by the District Council that planning officers can use their discretion where they believe there is potential for finds to be made and the County Council is automatically consulted on major schemes.

Recommendations

Delete the first paragraph

Include a map of the area around Lighten Brook, Lynch Field and Stanborough Mead and insert at the end of the second paragraph “as shown in Figure X”

Delete the final paragraph

Policy SLH3: Locally Valued Non-Designated Heritage Assets

85. I have no fundamental concerns regarding the choices of the heritage assets and their justification which are fully set up in the Slimbridge Local Heritage Report.

Appendix A

86. I do, however, have reservations regarding the designation of “The Nest” – the modern sculpture erected on Slimbridge Roundabout in 2021, which is being put forward as a heritage asset. As it is only two years old, the report recognises that it could be recognised as a heritage asset “in time”. I do not consider it presently meets the definition of being a “heritage asset” as set out in the Glossary of the NPPF and I will propose it to be deleted from the list.
87. I did seek clarification as to the extent of the designation of the Gloucester and Sharpness Canal and the Parish Council confirmed it was expected to cover the canal, the towpath and the canal banks. I will clarify that in my recommendation.
88. In terms of the ridge and furrow fields, I have examined many neighbourhood plans where these have been identified as non-designated heritage assets. However Figure 12 b shows ridge and furrow fields, which have not been verified as such and I will be recommending that these areas are excluded from the designation.

Recommendations

Delete “HA07 The “Nest” on Slimbridge Roundabout”

After “HA15 Gloucester and Sharpness Canal” insert “– canal channel, its banks and towpath”

Remove “Ridge and Furrow fields – not verified” from Figure 12 b

The Referendum Area

89. If I am to recommend that the Plan progresses to its referendum stage, I am required to confirm whether the referendum should cover a larger area than the area covered by the Neighbourhood Plan. In this instance, I can confirm that the area of the Slimbridge Parish Neighbourhood Plan as designated by Stroud District Council on 23rd July 2023 is the appropriate area for the referendum to be held and the area for the referendum does not need to be extended.

Summary

90. I congratulate Slimbridge Parish Council on reaching a successful outcome to the examination of its neighbourhood plan.
91. It is clear that a lot of hard work has gone into this plan by volunteers on behalf of the local community over the last few years and I am pleased to recognise their sterling work.
92. This is a locally distinctive plan which deals with the issues that are important to the community. The plan recognises that the issues around the proposed new settlement at Wisloe Green are beyond the scope of the neighbourhood plan and will be resolved through the local plan process.

93. To conclude, I can confirm that my overall conclusions are that the Plan, if amended in line with my recommendations, meets all the statutory requirements including the basic conditions test, and that it is appropriate, if successful at referendum, that the Plan be made.
94. **I am therefore delighted to recommend to Stroud District Council, that the Slimbridge Neighbourhood Plan, as modified by my recommendations, should proceed, in due course, to referendum.**

JOHN SLATER BA(Hons), DMS, MRTPI, FRGS
John Slater Planning Ltd
15th January 2024

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**Performance Monitoring Report
Environment Committee
Q3 2023/24**

Date of Environment Committee meeting	21 March 2024	
Date of Performance Monitoring meeting	8 February 2024	
In attendance	Members: Cllr Gordon Craig, Cllr Chloe Turner Officers: Brendan Cleere, Kate Hunt (note taker)	
Environment Ideagen dashboards	Main Environment dashboard Environment Performance Indicator dashboard	
Items on Environment agenda relevant to the Council Plan	EC2: Severn Estuary Mitigation Strategy	
Risks	Strategic Risk Register presented to Audits & Standards Committee	
Council Plan Actions Traffic Light Status	Red (Overdue)	0
	Amber (Overdue Milestone/s)	1
	Green (On Target)	18
	Cancelled	0
	Completed	6
Any issues of concern to be reported to Environment Committee		
Further to the update under ER5.1, the Local Plan Inspectors wrote to the Council following the end of Q3 on 5 th February 2024, confirming they have granted a 7 month pause to allow the Council, National Highways, Gloucestershire County Council and South Gloucestershire Council to progress the Joint Action Plan. This will then be followed by a 6-week consultation on the outputs. The Inspectors will then recommence the Examination.		
Any actions or recommendations for Environment Committee		
Report submitted by	Hannah Barton	
Date of report	11 March 2024	

**Council Plan Performance Monitoring Report – Environment
Quarter 3 2023/24**

EC1.1	Set up a 2030 Core Group to provide high level strategic overview on delivery, identify funding opportunities and develop communication and community engagement	<div style="border: 1px solid black; width: 50px; height: 15px; background-color: #4f81bd; color: white; text-align: center; margin: 0 auto;">100%</div>	Completed. A new action (ER1.1a) has been included resulting from the merge of EC1.1 and EC1.3 to ensure continued reporting on the work in this area.
Assigned To	Brendan Cleere; Georgia Spooner; Jenny Youngs		

EC1.1a	Facilitate continued community engagement through the established 2030 Community Engagement Board to support the delivery of the 2030 Strategy		<div style="border: 1px solid black; width: 50px; height: 15px; background-color: #4f81bd; color: white; text-align: center; margin: 0 auto;">20%</div>
Assigned To	Georgia Spooner; Jenny Youngs		
Latest Note	Q3 2023/24: 2030 Community Engagement Board has continued to meet and is currently reviewing its priorities and areas for focus in 2024/25.		
Milestones	Milestone Description	Completion Y/N	Milestone Due Date
	<i>This milestone will be reviewed once the new Climate Change and Sustainability Manager is in post:</i>	No	
	Work of the Community Engagement Board summarised in Annual 2030 report for 2023/24 to be published in Spring 2024 and annually thereafter.		

EC1.2	Establish the performance management of the 2030 Strategy across the organisation to monitor and review progress towards the Strategy's aims and commitments	<div style="border: 1px solid black; width: 50px; height: 15px; background-color: #4f81bd; color: white; text-align: center; margin: 0 auto;">100%</div>	Completed and closed.
Assigned To	Brendan Cleere; Georgia Spooner; Jenny Youngs		

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EC1.3	Plan and implement the community engagement aspect of the Strategy, to include a 2030 community website and direct activities with residents, linking to the Community Engagement Strategy (CW3.1)	<div style="display: flex; align-items: center;"> <div style="width: 100px; height: 15px; background-color: #5da5da; margin-right: 5px;"></div> 100% </div> <p>Completed and merged with EC1.1 (EC1.1a).</p>
Assigned To	Brendan Cleere; Liz Shellam; Georgia Spooner; Jenny Youngs	

EC1.5	Explore and progress additional projects for carbon reduction and /or biodiversity net gain and funding opportunities to deliver them.	<div style="display: flex; align-items: center;"> <div style="width: 100px; height: 15px; background-color: #5da5da; margin-right: 5px;"></div> 20% </div>
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Assigned To	Brendan Cleere; Georgia Spooner; Jenny Youngs		
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Sub Action	EC1.5.1 Identify funding opportunities for carbon reduction projects	15%	Q3 2023/24: Currently exploring funding opportunities with Climate Leadership Gloucestershire and partner authorities, to provide funding to continue and develop county wide retrofit projects for domestic properties.
	EC1.5.2 Identify funding opportunities for biodiversity net gain projects	25%	<p>Q3 2023/24: A funding request has been included in the budget for a new post in Development Management, to assist with new BNG requirements expected to come into force in early 2024.</p> <p>More widely on biodiversity, guidance has been issued to parish and town councils on the preparation of local biodiversity plans, and funding has been requested to put in place biodiversity management plans for Selsley Common, Stratford Park and Stringers Wood. We have also identified areas of council owned land to improve biodiversity by introducing different management regimes</p>

Performance Indicator Linked	<i>Please note, these PIs will be reviewed once the new Climate Change and Sustainability Manager is in post:</i>		
	EC1.5a Money leveraged through successful funding bids and level of associated council investment approved by Councillors		
	EC1.5b Number of additional projects established or supported with an estimate given of bio-diversity net gain and / or carbon savings that will be achieved.		
	EC1.5c Number of external projects worked on with partners for carbon reduction		

EC2.1	Work with partners to boost biodiversity by developing the Gloucestershire Local Nature Recovery Strategy and delivering its objectives through a district-wide Local Nature Recovery Action Plan, working with stakeholders				20%
Assigned To	Rebecca Charley; Conrad Moore				
Milestones	Milestone Description	Completion Y/N	Milestone Due Date	Latest Milestone Note	
	Publication of Gloucestershire biodiversity net gain guidance	Yes	30-Nov-2023	Q3 2023/24: The Biodiversity Net Gain guidance has been written and published, with all the Local Authorities in Gloucestershire using the guidance. There will be minor updates to the guidance once the Government has finally laid before Parliament the SI and the commencement date for the legislation has been confirmed.	
	Progress on recreation and mitigation strategy works for the Severn Estuary, Rodborough Common and Cotswold Beechwoods	No	31-Mar-2024	Q3 2023/24: Severn Estuary Mitigation workshops have been held with stakeholders and local authorities in September and October. Draft Mitigation Strategy has been produced. Feedback is currently under consideration. Rodborough Common and Beechwoods Mitigation Strategies were adopted Oct 2021. Mitigation funding is being secured through Development Management and Governance matters in progress.	
	Adoption of Severn Estuary Mitigation Strategy	No	01-Apr-2024	Q3 2023/24: Draft has been circulated. 2nd draft planned for Feb '24. Draft will go to Environment Committee Spring '24.	
	District document developed, aligned with Gloucestershire Nature Recovery Strategy	No	30-Sep-2024	Q3 2023/24: SDC Nature Recovery Action Plan will be produced following the publication of the Gloucestershire Local Nature Recovery Strategy, in Autumn 2024. Draft guidance on additional biodiversity duties for Town and Parish Councils was issued to all SDC parishes in December '23. Further training for T&PCs is being developed (for delivery by Spring '24) to assist with the development of their nature	

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				recovery action plans.
	Implement recreational pressure mitigation identified within the adopted strategies (SPA, RAMSAR, SAC site strategies)	No	31-Mar-2026	
Performance Indicator Linked	EC2.1a Achieve a minimum of 10% biodiversity net gain (BNG) from new developments	<i>The start date for this PI has been postponed to 1 February 2024 due to legislation still going through parliament.</i>		
	<i>These PIs are being reviewed to provide better alignment with the emerging Local Nature Recovery Strategy. Updated PIs will be provided in 2024:</i>			
	EC2.1b Increase in average insect biomass - based on Bug Life Citizen Science project data			
	EC2.1c Extent of strategic gaps in GI network			

EC2.2	Deliver the natural flood management project (Stroud Rural SUDS) for the Frome Valley in Stroud in partnership with the Environment Agency, working closely with landowners and communities using innovative flood management techniques.		 Completed and closed. Ongoing performance will be measured using the PIs below.
Assigned To	Maria Hickman		
Performance Indicator Linked	EC2.2a Number of interventions installed as part of the natural flood management project	2023/24: 100	
	EC2.2b Number of landowners engaged with the natural flood management project	<p style="text-align: center;">Q3 2023/24 result</p> 	<p>The third quarter is peak site work season for natural flood management and works were completed on two sites. Firstly, in Kingscote Woods in Horsley our work restored the stream back to its original position on the floodplain to allow water to spread across the area creating wetland or wet woodland. We implemented what is known as a stage “0” approach. This is where we fill in the existing artificial channel or bypass the existing channel and allow the water to find its own way across the floodplain. The project benefits include;</p> <ul style="list-style-type: none"> • The creation of a large and locally significant area of wetland /wet woodland resulting from the spreading of both low and high flows across the floodplain. • Significant benefits for downstream communities as the existing straight ditches convey high flows at significant speed and volume through the woodland, increasing flood risk for the town of Nailsworth. Allowing High flows to spread across the floodplain will slow flows and reduce peak flows through the woodland and into the valley. • Increased aquifer recharge -This will occur in periods of high flows as we expect significant infiltration through the floodplain into the aquifer under high flow conditions. • In summary, we created 2.7Ha of new wet woodland /floodplain wetland habitat in two distinct areas, improved approx. 800m of

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			<p>stream habitat and added over 100 LWD structures. The second work site was a phase 2 of works at Hammonds Farm in the Painswick Valley. Here, we have created a series of large interventions on the floodplain of the lower Painswick Stream using Ash and Alder trees. Approx 25 tree trunks have been kept whole and laid at right angles to the flow of the stream to attenuate flood waters on the floodplain and allow sediment and silt to drop out of the reduced flows created by the trees.</p> <p>Finally, we have agreed to hold an event during Stroud Film Festival to showcase the art, poetry and films we have commissioned. The event will be held on March 9th at the Museum in the Park.</p>
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EC2.3	Develop and establish an action plan to increase our tree canopy, woodland and forestry in line with the Gloucestershire Local Nature Partnership Tree Strategy ambition for 20% canopy cover across the County by 2030				0%
Assigned To	Conrad Moore				
Milestones	Milestone Description	Completion Y/N	Milestone Due Date	Latest Milestone Note	
	District document developed, aligned with Gloucestershire Nature Recovery Strategy	No	30-Sep-2024	Q3 2023/24 - This is linked with local nature recovery strategy. A mapping exercise is underway to identify strategic habitat locations within the district. This will complement the county development work.	
	Progress with tree planting schemes	No	30-Sep-2024	Q3 2023/24 - This is under review, to determine if accurate information can be recorded. SDC is not party to all planting projects.	
	Publication of Gloucestershire Nature Recovery Strategy	No	30-Sep-2024	Q3 2023/24 - Woodland habitat mapping is being incorporated into the Gloucestershire and SDC local nature recovery strategy.	
Performance Indicator Linked	EC2.3a Increase canopy cover in Stroud District, towards the target of 20% county wide coverage by 2030	<p><i>The measurement of tree canopy could be taken from Google aerial images, but any canopy measurements would not show sufficient change to measure more frequently than every 5 years at most. This is always subject to climatic influence at the time of the images used.</i></p> <p><i>The measurement of area planted could be used, but this does not necessarily reflect the benefit of such planting because it is important to ensure the right trees are planted in the right place and any planting does not cause a loss of other important habitat. This would be better linked with the Local Nature Recovery Strategy indicator, aiming at minimising the GI spaces, and joining up the key habitats, woodlands being one of those.</i></p>			
	EC2.3b Amount of land (hectares) subject to new tree planting				
	EC2.3c Canopy cover as a % of District				

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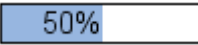
EC2.4	Work with partners to protect and enhance green spaces in residential neighbourhoods and town centres, promote 'No Mow May' and adopt best practice for road verges to encourage wildflowers and reduce pesticide use			0%
Assigned To	Rebecca Charley; Mike Towson			
Latest Note	Q3 2023/24: Agreement to not mow around trees to be implemented from 2024 cutting season. Good progress being made.			
Milestones	Milestone Description	Completion Y/N	Milestone Due Date	Latest Milestone Note
	Green Spaces Action Plan developed based on county-wide Nature Recovery Strategy	No	31-Mar-2023	Q3 2023/24: A mapping exercise to identify the strategic habitat corridors across Stroud District is taking place Jan '24. This will link to the Gloucestershire LNRS and help identify GI gaps in the network. A draft "SDC Managed Land" guidance note has been prepared and is awaiting response. Plans are being prepared for appointing an ecologist to prepare habitat management plans for Stringers Woods, Selsley Common and Stratford Park. (if the funding is confirmed as available).
	Develop and implement plans for expansion of No Mow May for 2024	No	31-May-2024	Q3 2023/24: Starting to look for alternatives to pesticide use in line with Council motion. Also started work to increase wildflower areas and slowly shifting some areas away from normal amenity grass cutting. No Mow May 2024 being planned.

EC2.5	Use, promote and support the Building with Nature standards for Local Plan sites and key regeneration sites across the district			0%
Assigned To	Brendan Cleere; Ali Fisk; Tom Ridley			
Milestones	Milestone Description	Completion Y/N	Milestone Due Date	Latest Milestone Note
	Building with Nature Standards endorsed in the Gloucestershire Nature Recovery Strategy	No	30-Sep-2024	Q3 2023/24: Work on the Gloucestershire LNRS is in progress and will incorporate the Building with Nature Standards
	District document developed endorsing Building with Nature Standards	No	30-Jun-2025	Q3 2023/24: The district document will follow the County wide Local Nature Recovery Strategy and will similarly endorse the Building with Nature Standards. This is expected to be finalised during 2025.
	Work with partners to promote the use of Building with Nature Standards	No	31-Mar-2026	Q3 2023/24: The output specification for Brimscombe Port includes using the Building with Nature Standards. The Draft Local Plan requires the standard for the proposed new settlements and strongly recommends it for other strategic sites.
Performance Indicator Linked	<i>These PIs will be in place once the Local Plan has been adopted:</i>			
	EC2.5 % of strategic sites in the Local Plan that incorporate the Building with Nature standards			
	EC2.5b Number of development sites (total area) in the district delivering Building with Nature standards			

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EC3.5	Develop planning policies and developer guidance to enable all new buildings to achieve a net zero carbon standard.	<div style="display: flex; align-items: center;"> <div style="width: 100px; height: 15px; background-color: #5da5da; margin-right: 5px;"></div> 100% </div> Completed and replaced with EC3.5a
Assigned To	Brendan Cleere; Tom Ridley	

EC3.5a	Produce supplementary guidance and work with developers to enable all new buildings to achieve a net zero carbon standard			<div style="display: flex; align-items: center;"> <div style="width: 100px; height: 15px; background-color: #d9ead3; margin-right: 5px;"></div> 0% </div>
Assigned To	Brendan Cleere; Tom Ridley			
Milestones	Milestone Description	Completion Y/N	Milestone Due Date	Latest Milestone Note
	Develop programme of support for developers to deliver standards	No	31-Dec-2024	
	Publish supplementary guidance	No	30-Sep-2024	Q3 2023/24: Work will commence on a supplementary planning document once the Local Plan Inspectors indicate that the draft policies are sound. Any new document will need to have regard to the new planning regime that is being introduced through the Levelling Up and Regeneration Act.
Performance Indicator Linked	EC3.5 Number of new dwellings that have achieved a net zero carbon standard by 2026			

EC4.1	Support a shift towards active modes of travel by working with the County Council and parish councils to increase use of an enhanced strategic and local walking and cycling network			
Assigned To	Simon Maher			
Latest Note	<p>Q3 2023/24: Both local and strategic projects continue to be funded. Of note for Q3 23/24 is the allocation of funds to Gloucestershire County Council in combination with CIL contributions to deliver a section of the Gloucestershire cycle spine at Standish. On a local level, footpaths in Cam and Woodchester have been improved with accessibility and resurfacing work.</p> <p>Collaborative work with GCC continues to progress following funding allocations for cycling and walking design work in Cainscross, Cam and Dursley and the proposed Wotton-Kingswood-Charfield greenway.</p> <p>Plans to host another Walking and Cycling event for Parish Councils, relevant organisations and stakeholders is in the pipeline. This is to be organised in collaboration with GRCC and other SDC officers.</p> <p>Gloucestershire Rural Community Council (GRCC) have been commissioned to promote the Walking and Cycling fund to Parish Councils.</p>			
Milestones	Milestone Description	Completion Y/N	Milestone Due Date	Latest Milestone Note
	Develop a dedicated walking and cycling page on the council's website where community design guidance and other tools can be used to support the development of local projects	No	31-Mar-2024	Discussions have taken place to do this in collaboration with other service areas with an interest in active travel. Webpage development on hold until IT complete the upgrade of the web hosting system.
	Develop and deliver a promotional campaign to encourage and support parish councils to make funding bids for local walking and cycling projects	No	31-Mar-2024	Gloucestershire Rural Community Council (GRCC) have been commissioned to promote the Walking and Cycling fund to Parish Councils. They have had 8 group discussions and sent out funding application forms and promotional flyers.
	Allocate funding to deliver improved and new priority strategic and local walking and cycling schemes	No	31-Mar-2026	Both local and strategic projects continue to be funded. Of note for Q3 23/24 is the allocation of funds to Gloucestershire County Council in combination with CIL contributions to deliver a section of the Gloucestershire cycle spine at Standish. On a local level, footpaths in Cam and Woodchester have been improved with

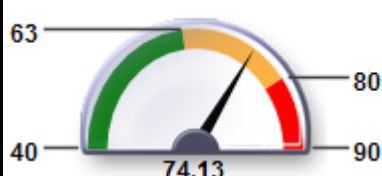
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				accessibility and resurfacing work.																	
	Develop and deliver promotional events and activities to encourage communities to take up active travel modes of transport	No	31-Mar-2026	Plans to host another Walking and Cycling event for Parish Councils, relevant organisations and stakeholders is in the pipeline. This is to be organised in collaboration with GRCC and other SDC officers.																	
	Provide input to GCC to aid the production of LCWIPs and the delivery of active travel projects	No	31-Mar-2026	Continue to work collaboratively with GCC Officers. No LCWIP updates for Q3 23/24. A county wide rural LCWIP is being worked on by GCC.																	
Performance Indicator Linked	EC4.1b Number of new or improved facilities such as cycle lanes, cycle tracks, walking trails																				
	EC4.1c Amount of funding allocated to and spent on improved and new strategic and local walking and cycling schemes	<p>Q3 2023/24 result £44,600.00</p> <p>Trend Chart</p> <table border="1"> <caption>Trend Chart Data</caption> <thead> <tr> <th>Quarter</th> <th>Funding (£)</th> </tr> </thead> <tbody> <tr> <td>Q4 2021/22</td> <td>£0.00</td> </tr> <tr> <td>Q1 2022/23</td> <td>£2,000.00</td> </tr> <tr> <td>Q2 2022/23</td> <td>£40,000.00</td> </tr> <tr> <td>Q3 2022/23</td> <td>£5,000.00</td> </tr> <tr> <td>Q4 2022/23</td> <td>£8,000.00</td> </tr> <tr> <td>Q1 2023/24</td> <td>£8,000.00</td> </tr> <tr> <td>Q2 2023/24</td> <td>£8,000.00</td> </tr> <tr> <td>Q3 2023/24</td> <td>£44,600.00</td> </tr> </tbody> </table>			Quarter	Funding (£)	Q4 2021/22	£0.00	Q1 2022/23	£2,000.00	Q2 2022/23	£40,000.00	Q3 2022/23	£5,000.00	Q4 2022/23	£8,000.00	Q1 2023/24	£8,000.00	Q2 2023/24	£8,000.00	Q3 2023/24
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Q3 2023/24	£44,600.00																				

EC4.2	In partnership with GCC encourage the expansion and improvement of public transport and links to walking and cycling routes – to include bus services and railway stations and services, and bids for new facilities that benefit residents			80%
Assigned To	Simon Maher; Conrad Moore			
Latest Note	Q3 2023/24: Continue to work with GCC to look for opportunities to improve public transport and active travel links.			
Milestones	Milestone Description	Completion Y/N	Milestone Due Date	Latest Milestone Note
	Endorsement of Gloucestershire Decarbonisation Statement of Intent	Yes	30-Sep-2023	Q3 2023/23 - Planning Strategy have endorsed this statement in Jan 2023. Accompanying Annex agreed Oct 2023.
	Input into Gloucestershire Decarbonisation Strategy	Yes	Completed 17-Jan-2024	Q3 2023/24: Input throughout the work. Strategy now endorsed.
	Publicity campaign promoting the use of public transport and links to active travel across the district	No	01-Apr-2025	
Performance Indicator Linked	<i>Currently looking into the availability of the data for these PIs and the frequency of capture.</i>			
	EC4.2a Percentage of trips taken by public transport			
	EC4.2b Co2/greenhouse gas emissions from transport			
	EC4.2c Number and frequency of public transport services			
	EC4.2d Number of public transport hubs			

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EC4.3	Working with partners, expand the network of Electric Vehicle charging points and increase support for low carbon transport, and a reduction in private car use and explore measures to reduce air pollution such as no-idling zones.		30%
Assigned To	Mike Towson		
Latest Note	Q3 2023/24: 50% grant funding from OZEV has been awarded in line with the previous committee/council report. This has secured the final necessary funding, after members approved the SDC capital funding contribution. The project will now move to the implementation phase after an official call off contract is entered in to. This is currently between One Legal and the legal team at GCC, who have prepared the procurement framework for SDC to use.		
Sub Action	EC4.3.1 Work with partners to expand the network of EV charging points and increase support for low carbon transport, and a reduction in private car use	60%	Q3 2023/24: Grant application in line with committee/council reports under consideration. Outcome expected soon, which will hopefully allow swift rollout of EVCPs in car parks as previously reported.
	EC4.3.2 Explore measures to reduce air pollution such as no-idling zones	0%	
Performance Indicator Linked	EC4.3 Number of EV charge points installed in SDC car parks	<i>This PI will not start collecting data until 1 January 2024 as plans for EV charging points were only approved at the end of 2023.</i>	

EC5.1	Further reduce the quantity of resources discarded as waste and minimise its environmental impact.		55%
Assigned To	Mike Towson		
Latest Note	Q3 2023/24: Resident engagement set to increase with new Waste Education Officer.		
Sub Action	EC5.1.1 Deliver 'Repair' campaigns via Gloucestershire Resources and Waste Partnership	55%	Q3 2023/24: Joint Gloucestershire PR campaigns ongoing with themes for 24/25 being set out in a marketing plan.
Performance Indicator Linked	EC5.1 (NI191) Number of Kilograms of residual household waste collected per household	<p style="text-align: center;">Q3 2023/24 result</p> 	
EC5.2	Work with our partner Ubico to identify joint opportunities for carbon reduction projects in household collection and management of public spaces.		60%
Assigned To	Mike Towson		
Latest Note	Q3 2023/24: HVO change making good progress.		
Sub Action	EC5.2.1 Use of HVO fuel fully rolled out on Ubico contract	60%	Q3 2023/24: HVO tank being procured.
Performance Indicator Linked	EC5.2a Number of carbon reduction projects scoped with Ubico, including analysis of potential carbon saving	Q3 2023: 1	
	EC5.2b Number of Ubico vehicles using HVO fuel	<i>The start date for this PI is 1 April 2024 as agreed in the project plan.</i>	

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EC5.3	Support the phasing out of single use plastics in the district and encourage and support local initiatives to 'reduce, repair and recycle'.		30%																											
Assigned To	Mike Towson																													
Latest Note	Q3 2023/24: Action planning meeting scheduled. Waste Education Officer to assist in driving agenda.																													
Sub Action	EC5.3.1 Create an Action plan based on facilities audits undertaken in 2023 and deliver against objectives	40%	Q3 2023/24: An officer review meeting took place on 25 January and an action plan is being developed in Q4.																											
	EC5.3.2 Develop local initiatives to promote "reduce, reuse and recycle"	20%	Q3 2023/24: Funding secured for drinking stations. Waste Education Officer to move project forward.																											
Performance Indicator Linked	EC5.3 Percentage of plastic as a part of the overall composition of dry mixed recycling, against a 2020/21 baseline.		<p>Q3 2023/24: 30.74%</p> <p>Trend Chart</p> <table border="1"> <caption>Quarterly Values and Target Data</caption> <thead> <tr> <th>Quarter</th> <th>Quarterly Values (%)</th> <th>Quarterly Target (%)</th> </tr> </thead> <tbody> <tr> <td>Q4 2021/22</td> <td>~28</td> <td>30.74</td> </tr> <tr> <td>Q1 2022/23</td> <td>~30</td> <td>30.74</td> </tr> <tr> <td>Q2 2022/23</td> <td>~25</td> <td>30.74</td> </tr> <tr> <td>Q3 2022/23</td> <td>~28</td> <td>30.74</td> </tr> <tr> <td>Q4 2022/23</td> <td>~28</td> <td>30.74</td> </tr> <tr> <td>Q1 2023/24</td> <td>~32</td> <td>30.74</td> </tr> <tr> <td>Q2 2023/24</td> <td>~38</td> <td>30.74</td> </tr> <tr> <td>Q3 2023/24</td> <td>30.74</td> <td>30.74</td> </tr> </tbody> </table>	Quarter	Quarterly Values (%)	Quarterly Target (%)	Q4 2021/22	~28	30.74	Q1 2022/23	~30	30.74	Q2 2022/23	~25	30.74	Q3 2022/23	~28	30.74	Q4 2022/23	~28	30.74	Q1 2023/24	~32	30.74	Q2 2023/24	~38	30.74	Q3 2023/24	30.74	30.74
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EC5.4	Continue to increase recycling rates across the district.		30%
Assigned To	Mike Towson		
Latest Note	Q3 2023/24: Waste Education Officer now in post. Engagement and projects to commence immediately. Impacts to be closely monitored.		
Sub Action	EC5.4.1 Introduce an additional material that can be collected at kerbside for recycling and develop communication plan to promote new material for recycling	30%	Q3 2023/24: Waste Education Officer now in post to drive this forward.
Performance Indicator Linked	EC5.4 (NI192) Percentage of household waste sent for reuse, recycling and composting	<p style="text-align: center;">Q2 2023/24 result</p> <p style="text-align: center;">59% 56% 40% 58.36% 80%</p> <p style="text-align: right;"><i>Figures for this PI are supplied by Gloucestershire County Council, and we await Q3's figures to be supplied</i></p>	
EC6.1	Continue to increase renewable generation in the district and to decarbonise existing networks, and support community-owned renewable energy schemes		60%
Assigned To	Brendan Cleere; Georgia Spooner; Jenny Youngs		
Latest Note	Q3 2023/24: Funding Opportunity from South West Net Zero Hub for community energy projects shared with partners including local energy groups and town and parish councils.		
Performance Indicator Linked	<i>Please note these PIs will be reviewed once the new Climate Change and Sustainability Manager is in post:</i>		
	EC6.1a Number of community owned or other renewable energy schemes supported by the council		
	EC6.1b Reported carbon saved/avoided		

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EC6.2	Deliver the water source heat pump projects at Ebley and Brimscombe Port Mills	100%
Assigned To	Ali Fisk	
Performance Indicator Linked	EC6.2 At least 97 tonnes of carbon saved per annum for Ebley and Brimscombe Port Mills combined	

EC6.3	Increase the proportion of Council and partner fleet vehicles powered by zero or low carbon technologies.	0%		
Assigned To	Mike Towson			
Latest Note	Q3 2023/24: Ubico fleet renewal taking place in line with Interim Fleet Procurement Strategy, agreed at committee in March 23.			
Milestones	Milestone Description	Completion Y/N	Milestone Due Date	Latest Milestone Note
	Full introduction of HVO as an alternative to diesel	No		Q3 2023/24: The use of HVO has been approved by committee with capital provision in place to mobilise. A new HVO tank is being procured with a view to commencing use by Apr 2024.
	Investigate feasibility of supply capacity upgrade, or PV and battery storage at Gossington Depot to enable further EV expansion on Ubico fleet	No	31-Mar-2026	Q2 Facilities Team to engage supply specialist to scope potential projects in the first instance. Fleet procurement decisions dictate that existing onsite EV chargers will be fully utilised in 2024 so further supply options are required for further expansion.
Performance Indicator Linked	EC6.3 % of fleet vehicles powered by zero or low carbon tech	Q1 2023/24: 13%		

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ER5.1	Progress the Local Plan through public examination and secure its adoption.				0%
Assigned To	Brendan Cleere; Tom Ridley				
Milestones	Milestone Description	Completion Y/N	Milestone Due Date	Latest Milestone Note	
	Local Plan adopted within 3 months of receiving the Inspector’s Report	No	31-Dec-2024	<p>Q3 2023/24: The Local Plan hearing sessions ended for a summer break at the end of June 2023. In August 2023 the Inspectors wrote to the Council identifying some areas of concern relating to the strategic road network and the two new settlements. The Council responded on 29 August and 12 September requesting a six month pause to address the concerns raised.</p> <p>The Inspectors wrote to the Council in August requesting SDC, NH, SCG and GCC produce a Joint Action Plan setting out the work to be undertaken in the pause. This was submitted 29/11/23. The Inspectors responded 18/12/24 requesting clarity on a number of points, SDC responded 19/1/24. SDC are currently awaiting the final Inspectors decision on granting the pause.</p>	
	Local Plan recommended for adoption by Government Inspector	No	31-Dec-2024		

ER5.2	Support the delivery of strategic site allocations contained within the local plan and the key infrastructure required to support it.		20%
Assigned To	Brendan Cleere; Tom Ridley		
Latest Note	Q3 2023/24: The Local Planning Authority has received a number of planning applications relating to the strategic site Local Plan allocations. Detailed assessment of these applications is continuing, pending a decision in principle from the Local Plan process.		
Performance Indicator Linked	ER5.2a Number of houses built annually compared with Local Plan requirements	<p style="text-align: center;">2022/23 result</p> <p style="text-align: center;">500 — 600 400 — 800 632</p>	

Council Plan Performance Monitoring Report – Environment
Quarter 3 2023/24

ER5.3	Work with parish councils to encourage and support local communities to develop Neighbourhood Development Plans and Orders, thereby increasing community planning activities		50%
Assigned To	Simon Maher		
Latest Note	Q3 2023/24: 2 NDPs have progressed to examination with a view to referendum and full adoption in May 2024. 2 further NDPs are progressing to first draft consultation phase, while 2 previously adopted NDPs are in the process of undertaking a plan review.		
Sub Action	ER5.3.1 Develop and deliver a promotional campaign to encourage and support parish councils to develop neighbourhood planning initiatives by March 2024	50%	Q3 2023/34: Gloucestershire Rural Community Council, as part of their SLA with SDC, have been holding workshops with Towns and Parishes, establishing whether NDPs will benefit their area.
Performance Indicator Linked	ER5.3 Number of Neighbourhood Development Plans and Orders progressed or reviewed	Q3 2023/24 result 3	

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ENVIRONMENT COMMITTEE

MEMBER REPORT

NAME OF ORGANISATION/BODY	Climate Leadership Group
DATE OF LAST MEETING ATTENDED	13 th February 2024
BRIEF REPORT	
<p>1. As this was our AGM, my first task was to hand over the baton to the newly elected Chair, Cllr Chris McFarling from Forest of Dean DC. Chris will hold the role for six months, and will then hand it on to his newly elected Vice-Chair, Cllr Mike McKeown (Cotswolds DC).</p> <p>2. The Group agreed that three non-voting memberships should be offered, to each of Gloucestershire Association of Parish and Town Councils; Gloucestershire Youth Climate Panel; and an Academia place (details TBC).</p> <p>3. The Secretariat introduced the Greener Gloucestershire Action Plan internal tracker, which amalgamates all of the recommendations approved by CLG over the last year. It was agreed that this will be used to monitor CLG actions and used to produce a public-facing action plan.</p> <p>4. The Secretariat provided an overview of the current status of the four funded projects using the £200,000 Fund, and that they are all now being progressed.</p> <p>5. The Group discussed a risk register (limited to the risks to the central CLG model as its function moves more towards that of a programme board, as opposed to the risks of individual actions on climate change). An initial list of risks was proposed and the Secretariat will bring a draft register to a future meeting.</p> <p>6. James Brain, Head of Planning at Cotswold District Council presented an update on the Planning theme.</p> <p>James outlined the key messages:</p> <ul style="list-style-type: none"> • The time is to tackle climate change within planning is now as all LPAs are at an appropriate stage of the plan-making process. • We have stretching net zero ambitions but LPAs do not have adequate policies within current adopted local plans. We need to change those ambitions into substance. • Planning resources are currently extremely stretched, and therefore introducing a commonality of approach, and doing things once together would create resources efficiencies. 	

- Others are already making great progress and there is now opportunity to taking learning from the best practice of Lancaster, BaNES, and Cornwall among others.

James set out seven key recommendations and the voting members approved these.

7. The Secretariat facilitated a communications plan workshop, to gain initial views ahead of the development of a CLG communications plan that will be brought back to future meetings
8. The Secretariat introduced the Behaviour Change theme update, confirming that 36 internal behaviour change recommendations had been approved by CLG in 2023, to foster awareness and drive change within our own organisations. Progress on their adoption has been monitored by the Secretariat with a high degree of variance with adoption of these recommendations between partners, with some perceived as being more easily deliverable than others. Mandy Gibbs spoke on Gloucestershire Constabulary’s experience with the ISO14001 environmental management system. Jen Cleary introduced how the NHS Hospitals Foundation Trust has instilled a culture of sustainability, with a key strand to this work being the introduction of green champions.

Meeting notes for Climate Leadership Gloucestershire are available on the Greener Gloucestershire section of the GCC website: <https://www.gloucestershire.gov.uk/planning-and-environment/greener-gloucestershire-climate-dashboard/our-partners/climate-leadership-gloucestershire-clg/climate-leadership-gloucestershire-clg-meeting-notes/>

REPORT SUBMITTED BY	Cllr Chloe Turner
DATE	10 March 2024

Retrofit support for self-funding households

1. Purpose

The purpose of this paper is to update members on the Council's role as the 'Retrofit lead' within Climate Leadership Gloucestershire and, specifically, to brief on the approach being taken across the County to promote action on domestic retrofit for self-funding households (sometimes referred to as 'able to pay').

'Retrofit' in the context of this paper is the modification of buildings to make them more energy efficient, low carbon and comfortable.

2. About Climate Leadership Gloucestershire (CLG)

Climate Leadership Gloucestershire is a partnership of all Gloucestershire local authorities, working together to tackle the climate and ecological emergency.

Further details about CLG can be found via the following link:

[Climate Leadership Gloucestershire \(CLG\) | Gloucestershire County Council](#)

The work of CLG is broken down into ten themes, each with an assigned local authority/organisational lead. The themes and lead agencies are as follows:

- **Adaptation** – Gloucester City Council
- **Behaviour Change** – Internal: Gloucestershire Police and NHS; External: Gloucestershire County Council
- **Biodiversity** – Gloucestershire Local Nature Partnership
- **Economy, Business and Skills** – GFirst LEP
- **Energy** – Forest of Dean District Council
- **Food and Farming** – Cotswold District Council
- **Planning** – Cheltenham Borough Council
- **Retrofit** – Stroud District Council
- **Transport** – Gloucestershire County Council
- **Waste** – Gloucestershire Resources and Waste Partnership

SDC's representatives on CLG are Cllr Chloe Turner and Brendan Cleere (Strategic Director of Place) and regular information updates on are provided at meetings of Environment Committee.

Brendan Cleere, Strategic Director of Place
Email: brendan.cleere@stroud.gov.uk

3. The Retrofit Theme

SDC is the assigned lead for retrofit within CLG and this involves action in the following areas, which all CLG partners have also signed up to:

- **Development of the Retrofit Centre Website** – giving householders the advice and signposting to appropriate support to retrofit their home.
- **Green Skills Development** – stimulating the supply of installers with skills in green and low carbon technology.
- **Expert Support** – seeking further funding for third party expert support to engage those households that are able to finance retrofit work and to further develop the Retrofit Centre platform.
- **Market Support** – sharing best practice on retrofit across Gloucestershire, including learnings from retrofit projects in progress.

4. Advancing Retrofit for Self-Financing Households

SDC officers have been working with CLG colleagues to advance the retrofit area of work in respect of those people who are able to self-finance works to their own property.

We are pursuing a cost-effective approach that will involve the procurement of an expert contractor. The expert contractor would provide an online advice platform, along with pathways to home assessments and retrofit installation, with additional support to residents considering self-funded investment in retrofit. This could potentially be feasible utilising a modest budget aggregated across districts. This would be a highly visible and proven method to encourage the retrofit market in Gloucestershire at relatively low cost. It would also help to make residents' homes warmer, more comfortable, and cheaper to run; as well as tackling the quarter of the county's emissions that come from domestic housing. It should be remembered that the 'self-financing' market is still small and will need a lot of promotion.

Consequently, there is also a recommendation to commit further officer support and time to this work, to assist in developing the in-depth community engagement needed. This will include co-ordinating messages with other partners such as the NHS, to present and promote a unified Gloucestershire retrofit support offer. If delivered successfully this would represent a nationally leading approach to homeowner retrofit support.

Brendan Cleere, Strategic Director of Place
Email: brendan.cleere@stroud.gov.uk

Environment Committee
INFORMATION SHEET (008)
21 March 2024

The rationale for the above approach is as follows:

- There is evidence that homeowners want to improve their homes' energy efficiency, but often don't know where to start and are concerned about doing the wrong thing. This support will help them take needed steps.
- This would be a valuable offer to residents, allowing them to make their homes greener, warmer, and more comfortable.
- This action is needed to tackle the 25% of county Greenhouse Gas Emissions that come from domestic properties.
- It's a pioneering approach in a two-tier area to this issue- where Combined Authorities and unitary authorities are often viewed as the trailblazers.
- This is a clear opportunity to demonstrate Gloucestershire authorities' leadership and coordination on retrofit; and could attract further funding and prospects for future net zero homes innovation.

Progressing to the next stage of commissioning an expert contractor will involve the development of a brief to include several service elements:

- An online one-stop advice site for residents, such as the Retrofit Centre
- Further support for residents to access house assessments and unbiased retrofit advice with confidence
- A recommended network of retrofit installers and suppliers
- Effective marketing of the service- with a focus on direct community engagement
- Work to stimulate in-county installation supply and address Glos skills gaps
- Solutions for residents on how to finance the changes to their homes
- Sufficient reporting on customer satisfaction, uptake, and demographics

5. Next Steps

CLG will develop the brief with input from all Gloucestershire local authorities and proceed with a procurement exercise in line with relevant legislation. Any subsequent engagement of a commercial delivery partner would need to ensure that the commissioning councils enjoyed continuous insight into performance of the service such as resident satisfaction; emissions reduction; bills reduction; the business process; GVA in the county; rate of uptake; and resolution of any complaints. Such active oversight would be required a) to satisfy council decision makers that risk is mitigated through the 'control' of the delivery partner, and b) to provide assurance to residents that the continuous council oversight helps ensure good outcomes and leverages the trust that residents have in councils to be objective in service delivery.

Brendan Cleere, Strategic Director of Place
Email: brendan.cleere@stroud.gov.uk

**Environment Committee
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21 March 2024**

SDC is now working with CLG colleagues on the following actions, all of which are within current Council Plan and budget commitments:

- Supporting a procurement exercise to find a suitable expert contractor, noting that approval will be sought before an Invitation to Tender is issued and that the local authorities are not bound to take the services and may choose to vary its requirements following completion of the Procurement exercise.
- Providing an estimated maximum budget of £3,750 per annum, to finance an agreement to include all service elements, and provide further retrofit communications and marketing.
- Committing a portion of our climate and communications team resource to the procurement process (estimated as 5 days total per Council) and to the subsequent promotion of retrofit service and assisting in organising and delivering retrofit community events (estimated as 14 days per annum).

The above steps will be taken in the coming months, with updates to be provided at future CLG meetings and decisions taken at individual authority level as appropriate.

Brendan Cleere, Strategic Director of Place
Email: brendan.cleere@stroud.gov.uk

Cotswolds National Landscape Board Net Zero Pathway – for SDC adoption.

Cotswolds National Landscape (CNL) Board commissioned Small World Consulting to undertake a Climate Impact report for the Cotswolds in 2022. This report has been used to provide a basis for further workshops and the development of an action plan for the Cotswolds.

These workshops were led by 3Keel – a consultancy, who facilitated the workshops and have put together a report and climate change action plan for the CNL. This was presented to the CNL board in February and is attached.

The CNL are in the process of appointing a new Climate Change Lead, aiming to start as soon as possible. The Lead will be responsible for implementing the recommendations within this report. Attached is an overview of the outcomes from the report. A full copy of the report can be supplied on request to Rebecca Charley.

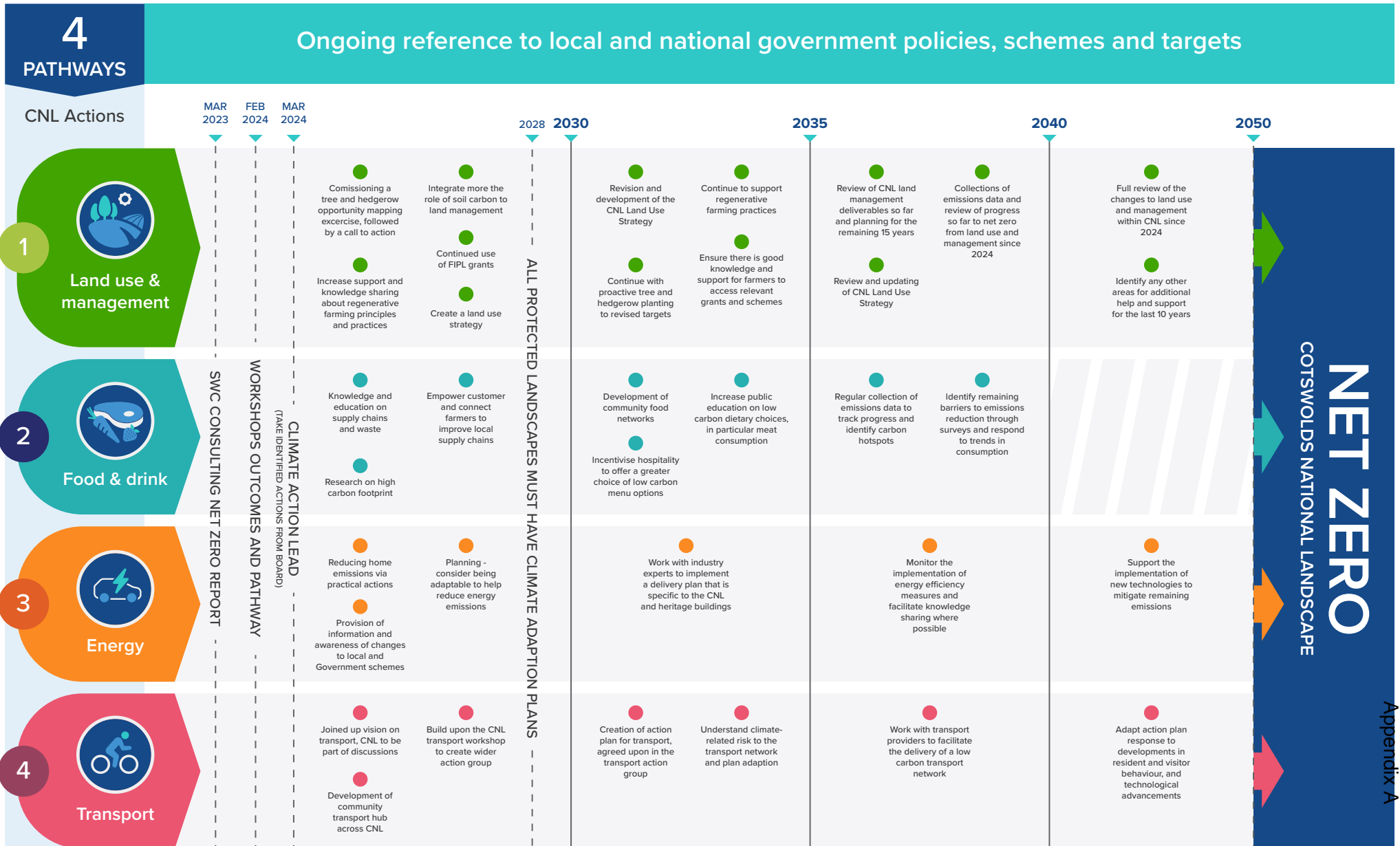
Rebecca Charley, Strategic Lead for Nature Recovery and Biodiversity
Email: Rebecca.charley@stroud.gov.uk

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PATHWAY TO NET ZERO OVERVIEW



Cotswolds National Landscape



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ENVIRONMENT COMMITTEE

MEMBER REPORT

NAME OF ORGANISATION/BODY	Lower Severn Internal Drainage Board
BRIEF REPORT	
<p>The Lower Severn Internal Drainage Board, (LSIDB), is a statutory body responsible for keeping streams, rhynes and large watercourses maintained in order to help prevent flooding on land, in villages and more isolated areas from flooding in times of heavy rainfall. The rivers Severn, Frome, Cam, and Little Avon come under the scope of the Environment Agency, although LSIDB can carry out work on behalf of the EA, on a rechargeable basis.</p> <p>LSIDB also has five pumps to help minimize and relieve flooding. These pumps are at Saul, Epney, Longney and Elmore Back in the Stroud District, and Oldbury on Severn in South Gloucestershire. The LSIDB catchment area is from the Malvern area in the north, to Bristol City/Avonmouth in the south, parts of the Forest of Dean in the west to areas between the M5 motorway and the A38 in the East. Its funding comes from levies paid by landowners within the catchment area, from Councils who collect through the Council Tax system from householders within the catchment area, and from developers who pay through S.106 agreements to maintain watercourses affected by their development. It has a workforce of operators of machinery, some heavy duty, ranging from chain saws to weed cutters to excavators. The Board's Headquarters are at Oldbury Naite, in South Gloucestershire, not far from Thornbury. There are administration staff employed there, along with a Land Drainage Engineer, a Civil Engineer and the Board's Chief Executive also heads operations there. At those HQs, there is a workshop with a fitter, able to carry out day-to-day repairs to machinery and to breakdowns, although large works may have to be outsourced if local facilities are not capable of doing them. The current Chairman of the Board is Mr. Mike Barnes, who farms at Malvern, the Vice-Chairman of the Board is Cllr Matthew Riddle of South Gloucestershire Council.</p> <p>Currently, the Board has to focus on replacing the five pumps mentioned previously, in its area, to comply with European and EA regulations to make them fish and eel friendly. That is so that fish and eels can pass through the working pumps without being harmed. Saul and Elmore Back have been replaced in the last couple of years, with Marshfield, (Epney) and Lapperditch (Longney) next on the list, which will leave Wicks Green, (Longney) and Oldbury on Severn to do. The Board does not have reserves to fund these replacements in the time available, so has to consider borrowing from the Public Works Loans Board to do the required work. As the buildings housing these pumps are up to 50 years old, along with the associated attached machinery, a thorough appraisal of costs will be necessary to prevent extra costs coming during the work to replace the pumps. However, it is hoped that all the remaining pumps will be replaced by the end of 2026.</p>	

The Board starts its reed and weed cutting programme in ditches around the end of June, which goes on into the late autumn. Large roadside ditches in the Severnside parishes of SDC are good examples of the work done by the Board. Outside of these times, dredging, tree maintenance and fence works are carried out on Board maintained watercourse. More information is available at lowersevernldb.org.uk

REPORT SUBMITTED BY	Cllr John Jones
DATE	18 January 2024

STROUD DISTRICT COUNCIL

ENVIRONMENT COMMITTEE

WORK PROGRAMME FOR 2024/2025

Date of meeting	Matter to be considered (i.e. insert report/project title)	Notes (e.g. lead member & officer)
	Appointments a) Performance Monitoring Representatives b) Outside Bodies	Committee
	Member/Officer Reports: a) Strategic Planning Advisory Board b) Stroud Regeneration Committee c) Performance Monitoring Q4 d) Climate Leadership Group e) Walking and Cycling Update	Councillor TBC Councillor TBC Councillors TBC Councillor TBC Senior Neighbourhood Planning Officer
	Work Programme	Chair/Strategic Director of Place/Committee
19.09.2024	Budget Monitoring Q1	Accountant
	Anti-Social Behaviour Policy	Head of Community Services
	Member/Officer Reports: a) Strategic Planning Advisory Board b) Stroud Regeneration Committee c) Performance Monitoring Q1 d) Climate Leadership Group e) Walking and Cycling Annual Report	Councillor TBC Councillor TBC Councillors TBC Councillor TBC Senior Neighbourhood Planning Officer
	Work Programme	Chair/Strategic Director of Place/Committee
05.12.2024	Ubico Annual Presentation	Managing Director, Ubico
	Collection of Textiles at the Kerbside	Senior Community Services Officer
	Budget Monitoring Q2	Accountant
	Revenue Estimates Revised 2023/24 and original 2024/25	Accountant
	Community Infrastructure Levy Spending Allocations 2024-25	Senior Community Infrastructure Officer
	Open Spaces in New Residential Development - Findings of Actions	Strategic Director of Place
	Member/Officer Reports: a) Strategic Planning Advisory Board b) Stroud Regeneration Committee c) Performance Monitoring Q2 d) Climate Leadership Group	Councillor TBC Councillor TBC Councillors TBC Councillor TBC
	Work Programme	Chair/Strategic Director of Place/Committee
	Member/Officer Reports: a) Strategic Planning Advisory Board b) Stroud Regeneration Committee	Councillor TBC Councillor TBC

	c) Climate Leadership Group	Councillor TBC
	Work Programme	Chair/Strategic Director of Place/Committee
06.03.2025	Budget Monitoring Q3	Accountant
	2030 Annual Report	2030 Strategy Manager
	Member/Officer Reports: a) Strategic Planning Advisory Board b) Stroud Regeneration Committee c) Performance Monitoring Q3 d) Climate Leadership Group	Councillor TBC Councillor TBC Councillors TBC Councillor TBC
	Work Programme	Chair/Strategic Director of Place/Committee

Reports for future meetings:

Local Plan Modifications – Head of Planning Strategy and Economic Development

Published Members' Information Sheets		
Date sent (& ref no)	Topic	Notes (eg responsible officer)