

Analysis of Regulation 14 consultation for the Slimbridge Parish Neighbourhood Development Plan Draft 10

8 June 2023

Introduction

The Regulation 14 consultation for the Slimbridge Parish Neighbourhood Development Plan took place from 23 January 2023 to 5 March 2023. The questionnaire used is shown in Appendix A. The form showed at Appendix B was used to collect signatures and comments from residents at parish events. Responses were also accepted by e-mail or letter. Statutory consultees invited to respond are shown at Appendix C.

Hard copies of the Draft NDP and questionnaires were made available at the following locations:

Slimbridge Village Hall
Slimbridge Parish Church
Slimbridge Primary School
The WWT
The Tudor Arms
The George
The Black Shed Café

Number of Responses received

The following responses were received:

Online and hard copy returns	Number	Rep Nos.
Live in the parish	31	
Live and work in the Parish	3	
Live and are a landowner in the parish	5 }	1-41
Live, work, statutory consultee and are a landowner in the parish	1	
Statutory consultee	1	
E- mail and letters		
Live in the Parish	6	42-47
Statutory consultees	13	47-59
Landowner not in the parish	1	60
Signatories		
Live in the parish	8	61-68

Statutory Consultees

The list of Statutory Consultees contacted is shown at Appendix D.

Responses were received from:

Rep No	Statutory Consultee
17	The Marine Management Organisation *
48	Gloucestershire County Council
49	The Coal Authority
50	National Highways
51	Natural England
52	Historic England
53	Network Rail
54	Severn Trent
55	Sport England
56	Ernest Cook Trust
57	Distinctive obs ECT & GCC
58	Canal and Rivers Trust
59	Stroud District Council

* Representation was withdrawn on 6 March 2023

Representations received and actions taken

Many comments were received such as: excellent, no comment, OK, fully agree, a sensible document achieved after lot of hard work. For the sake of brevity these are not included in the comments but can be found in the spreadsheets containing the raw data.

1 Any comments on the draft NDP vision statement?

Rep No.	Comment	Action taken
6	Generally great. However, there is no reference to the safety of the A38, and in particular the junction with Ryalls Lane, where there is a restricted view of northbound traffic. Increased development = increased traffic. I would like to have added that good agricultural land should not be taken out of production - this is no different to the preservation of orchards.	A38 point noted and will be passed to the Road Safety Group Taking out of use BMV land is discouraged under the NPPF
11	Part of the vision should be Slimbridge is a safe place to live and work	Add to Vision Point 3? “ Slimbridge is a safe place to live and work and the quality of life is improved for residents of all ages and physical abilities”
16	'Opportunities to respond to climate change' ... nonsensical	Noted
20	Our villages and hamlets maintain their distinctive ambience; reflecting their close connection to the peaceful countryside, strong community spirit and local character. SUPPORT ◇ Change continues to happen organically, as it has done over the centuries. New development responds to the needs of local people - AGREE (local means Slimbridge Parish) ◇ The quality of life is improved for residents of all ages and physical abilities. AGREE ◇ Opportunities to respond to climate change and manage flooding issues are taken. I AGREE with responding to flooding issues, however I disagree with some of the detailed objectives with respect to climate change ◇ Biodiversity thrives; orchards and allotments flourish, green spaces are respected, and the cherished views conserved. AGREE with the exception of allotments. Over many years land has been offered free of charge to parishioners (those with large gardens) and there has never been an uptake. I believe this particular objective is ideological and not required. ◇ Tourism continues to benefit the Parish economically; AGREE however those visiting the WWT will wish to take their own cars to the centre. Attempts to try alternative forms of transportation have failed numerous times. If the WWT wish to fund a bus from the train station, it	Climate change - noted Allotments – the survey showed a significant level of demand for allotments and should therefore be part of the NDP. Action to implement the delivery of allotments will rest with the Parish Council and a working group. Difficulties caused by non local cyclists are noted and any actions to be taken will rest with the road safety group. Agreed regarding privately run community facilities but these are also covered by encouraging appropriate businesses

	<p>is within their gift to do so.</p> <p>◇ Walking and cycling is easier; local rights of way and lanes are maintained and enhanced. AGREE, however the majority of cyclists are not local to the area and I have experienced a lack of respect for local residents and businesses.</p> <p>◇ Appropriate businesses and agriculture, especially those offering apprenticeships, are encouraged. People can work from home easily. AGREE</p> <p>◇ Improvements and expansion of community facilities will promote their use. This should include facilities that are privately run but offer a recreation service ie. Equestrian facilities. I do not agree that any form of expansion should take place at the football ground. This is no longer a “local” community facility and it is run by parties outside of the parish.</p> <p>◇ The exploration and understanding of our rich heritage and archaeology will illuminate our past and guide our way into the future. AGREE</p>	
21	<p>The strong desire to maintain the rural nature and connection to a peaceful countryside is welcomed. Management of flooding, protection and enhancement of biodiversity and ecosystems is also appreciated and agreed. Frequent calls for people interested in allotments by the Parish Council have never yielded any positive response. There appears to be no interest or desire for residents to have new allotments and this would be a distraction from matters mor important to people of the Parish.. Whilst climate change is frequently referenced, my experience as a District Councillor is that this is only an issue for a very small minority of residents. Protection and enhancement of ecosystems and biodiversity yes, but most I encounter state they believe there should be a gradual evolution to new power systems, means of transport and food production etc as technology advances rather than a panicked revolution. Most appreciate the presence of WWT but management of the less positive impact is also frequently referenced. It is pleasing to see this recognised in the vision statement.</p>	<p>Allotments – the survey showed a significant level of demand for allotments and should therefore be part of the NDP. Action to implement the delivery of allotments will rest with the Parish Council and a working group.</p> <p>Power systems – evolution rather than revolution is noted and agreed.</p> <p>WWT – A group has been formed to ensure that the relationship with the WWT is improved and progress to date is encouraging.</p>
27	<p>Top heavy on Eco, ultra light on Social / Affordable Housing / Employment Land</p>	<p>The need has been assessed by two housing needs surveys, one of which was independent. Employment is covered in Policy SLW4</p>
41	<p>How does the Parish benefit economically from tourism? I am not sure that is does. Do we want to encourage more? There isn't the infrastructure to support it.</p> <p>Is there scope to explore new rights of way - particularly those closed by Peter Scot - access to River Severn</p>	<p>Some businesses in the Parish benefit from tourism and the NDP does not seek to encourage more but seeks to manage the impact of tourism. This will be passed on toi the LHS for investagation.</p>

	Increased variety of local facilities / activities	
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2 Any comments on the draft NDP objectives?

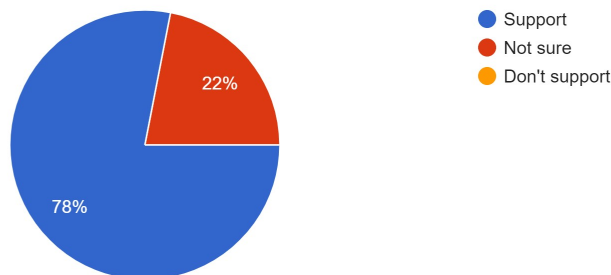
Rep No	Comment	Action taken
4	Does not go far enough in protecting wildlife and their habitats. The development section doesn't even mention not destroying or reducing habitats.	Covered by O3 and O5
6	Road safety as above. There should be a stronger requirement for evaluation of sewage capability prior to any development being approved.	Covered by O2
11	There should be an objective clearly linking to Slimbridge being a safe place. This will be supported by details such as the introduction of a 20mph speed limit, protecting other Road users from large tractors, heavy lorries and Argentine Camper Vans. Keeping close ties with the PCSO and possibly reinvigorating Neighbourhood Watch.	Change Vision 3 to " <u>Slimbridge is a safe place to live and work and the quality of life is improved for residents of all ages and physical abilities.</u> This is then supported by several Objectives and Policies
16	'Addressing the Climate Emergency in Slimbridge Parish' - grandiose nonsense	Noted
21	Most is laudable and I support. However, I have the following comments: O.4. There is no demand for allotments and focus on this will distract from areas of genuine concern for residents. O.6. There is outright opposition to many current renewable technologies including large scale solar and wind. Promoting these areas conflicts with the vision to maintain the rural nature of the Parish and is not welcomed by a majority of residents. O.16. Those that wish to use electric vehicles need to consider how they will charge them. Providing public EV charge points in a small Parish like Slimbridge at parishioners expense is inappropriate. Any new build individual properties could have them incorporated for personal use.	Allotments – the survey showed a significant level of demand for allotments and should therefore be part of the NDP. Action to implement the delivery of allotments will rest with the Parish Council and a working group. O6 Encourages “community-led” initiatives not large scale projects or battery farms. O16 Agreed that any EV charging points should not be funded from the precept.
27	Fails to recognise that a village needs to live. So not everything can be just lovely.	This is covered by Point 2 in the Vision which recognises that change happens but should respond to local needs.
32	This is a thorough plan for Slimbridge parish and it is up to the local council to implement what is written within.	Noted
34	I believe that when implemented fully the objectives within the N.D.P. will enhance and make the parish an improved place in which to live and work.	Noted
36	I'm principle I agree but I have concerns regarding too much of a	Noted

	focus a perceived climate emergency. I agree there are flooding issues to be addressed. I support renewable energy on roofs only.	
37	Good focus on sustainable development, anti-flooding measures and emphasis on local food production	Noted
38	I would like more focus on evolutionary ways of evolving our special parish, retaining its rural aspects and refraining from urbanising it. Reducing light pollution, improving wildlife and protecting the rural way of life.	Noted
40	The objectives appear to support the vision well	Noted
41	O13 - This should include sports facilities as well as play O15 - To promote safe roads for pedestrians O19 See comments under vision	O13 Change to "including play areas and sports facilities" O15 Change to "Integrated, safe and accessible"

3 What are your views on Draft Policy SCE1: Natural Flood Management?

What are your views on Draft Policy SCE1: Natural Flood Management?

41 responses



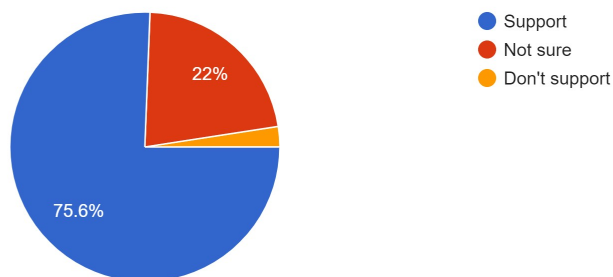
Rep No	Comment	Action taken
6	Development outside flood areas can impact on flood prone areas, so all areas within the parish should be included.	This point is covered in 5A.15 and references NPPF Para 161
12	Not sure that SUDS are the answer to surface water management on new developments. Easy for a developer to put in but what happens when they do flood ? Developers should provide better, integrated systems which improve overall surface water for the wider area that they are developing .	Agreed and is covered by the NPPF
14	There is a need for SDC support in monetary and legal terms.	Agreed
15	There could be mention of the responsibility of land owners to be aware of and to maintain any features that are part of the drainage system - eg keeping drainage ditches free running, not building on or filling up drainage ditches - this would relate to ditches not being maintained by Internal Drainage Board	Add to supporting text to cover this issue
19	This is a priority now and will increase in importance as climate change progresses and as pressure grows to succumb to risky local development.	Noted
20	I do not support any new development on or near any areas prone to flooding (including surface). Known ecologically tried and tested forms of flood management should be used and show they deliver biodiversity improvements.	Noted but a complete ban is not feasible

21	There should be a presumption against development in areas prone to flooding and in their environs. Efforts should be made by promoting the ecological and biodiversity ambitions within the Draft NDP to slow water drainage within large, unbuilt, natural and arable areas using known, tried and tested habitat creation techniques, to create hydrological brakes and buffers to the flow of fluvial water towards built form.	Agreed and is covered in Para5A.18
25	We live on an important flood plain , essential habitat for wildlife. So flooding should be expected.	Noted
27	The picture you show is field run off, not helped by the drain not being at the low point. Didn't notice how that is to be addressed	Noted
30	Please read not sure as I have no opinion on this	Noted
31	Parish Council are looking into appointing a flood warden who would liaise with all relevant authorities on flood prevention and mitigation.	Noted
39	Fig 3B shows flooded properties as Shadows Green, Applecroft, Puffins, Orchard House, and Fieldside. Where does the evidence for this come from because it is incorrect.	Reference to individual properties is removed.
41	Enforcement of proactive mgt of ditches, cleaning should be a priority. This would eliminate flooding risk. I appreciate there is no registration of ditch owners to assist with this.. The flooding photographed above was a result of ditches and heavy rainfall. The flooding was the worse for 17 years due in part to the re-surfacing.	Add to supporting text to cover this issue

4 What are your views on Draft Policy SCE2: Retrofitting Existing Buildings?

What are your views on Draft Policy SCE2: Retrofitting Existing Buildings?

41 responses



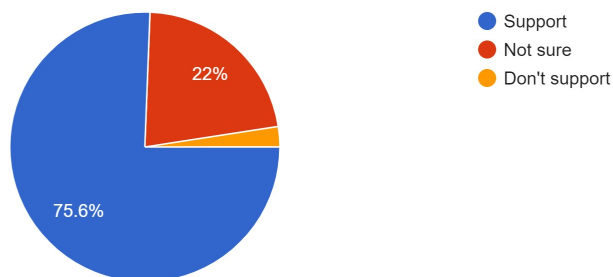
Rep No	Comment	Action taken
4	Solar etc are good, but who is going to pay for it	Not a function of the NDP but is covered by Central Government grants.
14	Sensible use of old buldings	Noted
18	Improving standards of insulation in existing buildings together with improving energy efficiency and reducing carbon emissions all of great importance now more than ever.	Noted
24	In principle a good idea, but who pays? Available grants? An elderly population may not consider such improvements, but as time passes younger families seeking a rural location may be more receptive. Current planning regulations in respect of listed properties would need to be reviewed with a view to perhaps maintaining the facade, but allowing internal improvements. With the current energy crisis, listed buildings with inefficient insulation and heating will become less attractive, particularly if planning controls prevent energy efficient modernisation and then these buildings could fall into disrepair thereby resulting in the collapse of the very thing you are trying to preserve.	Noted. This issue can not be tackled in the NDP but would require a Central Government review of listed building regulations.
27	Why such a high priority	Noted
37	how would this work with listed buildings?	This issue can not be tackled in the NDP but would require a Central Government review of listed building regulations
41	Would this include monetary support or is it restricted to support	The NDP can not provide financial support but seeks to provide

when planning is required? (I'm not sure whether planning permission applies). N.B. There are properties which are not connected to the gas or the sewage systems.	support for planning applications.
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5 What are your views on Draft Policy SCE3: Natural capital, Biodiversity and Ecosystem services?

What are your views on Draft Policy SCE3: Natural capital, Biodiversity and Ecosystem services?

41 responses



Rep No	Comment	Action taken
4	Nature and biodiversity should not only be assessed from a 'what do humans get from it' point of view, it should be protected regardless of people extracting value. That said, the benefits of nature and wild areas to mental health are proven multiple times.	Noted
15	Highlighting more the need for better management of verges and other green spaces (such as the green at Cambridge and a cessation of the relentless, ill timed mowing there) - a very achievable way to increase biodiversity. Appropriate cutting regimes (informed for example by Plantlife's 'Managing grassland road verges') and cutting only where necessary (eg road safety) rather than to 'tidy up the countryside'. Embracing 'NoMowMay'.	The formation of the wildlife and verges groups have ensured that this issue is covered.
19	This is a priority now and will increase in importance as climate change progresses and as pressure grows to succumb to risky local development. It is essential that this policy and natural flood management are developed hand-in-hand.	Noted
20	Support however, the policy should be amended to include protected species that are not mentioned in the policy inc curlews. This is particularly important in relation to farmland which supports over wintering birds using fields for resting and feeding (functionally linked land) to the special	Modify supporting text

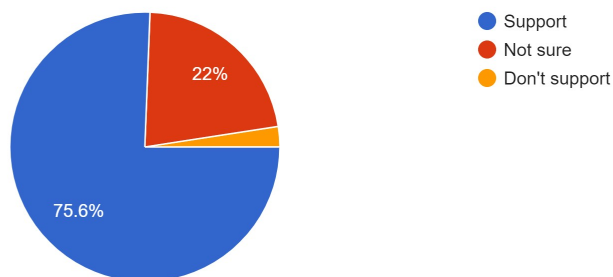
	<p>protections in the estuary environment.</p> <p>Please amend Figure 3b as this does not include the known flooding which blocked the A38 (south of roundabout).</p> <p>Figure 6 - I disagree with the proposal for a community orchard at the village green in 0000ton. It should be designated a place for biodiversity improvement.</p>	<p>Agreed</p> <p>There are no plans for this to become a community orchard</p>
21	<p>It is important to protect the right sort of ecosystem. Slimbridge Parish is largely contained within low lying, semi wet grassland and former river floodplain. As Professor Graham Garbutt noted in the Gloucestershire 2050 report, 'the Severn Grassland ecosystem is, in many ways, more precious and threatened than the Cotswolds AONB and yet enjoys none of the protections'. There always appears to be a rush to plant trees and hedgerows as 'ecological enhancement'. Developers often cite these in their efforts to promote an appearance of ecological harmony. This is generally inappropriate in the 'Severn Grasslands' that Professor Garbutt references where wide open spaces with only occasional trees, small coverts and hedgerows are the developed natural state. The threatened species such as Curlew and Lapwing, that rely on these habitats require wide open spaces to feed, rest and breed where they can see predators coming.</p>	<p>Agreed, trees should be planted in appropriate places, they are not a panacea for solving all problems.</p>
25	<p>Verges should be a priority in the area, they are important to Wildlife. Should be managed in line with Wildlife Trust and Plantlife guidelines. Mowing left to the end of summer etc.</p> <p>Also allotments should be seen as being essential.</p>	<p>Agreed</p>
27	<p>Just impractical</p>	<p>Noted</p>
31	<p>Future policy should prevent felling of large numbers of mature trees in the parish as happened at WWT in the last three years.</p>	<p>Agreed</p>
41	<p>How would you enforce the management and maintenance of orchards when residents are allowed to proceed with permitted development in their gardens / orchards?</p>	<p>Definitions of orchards exist and will be used.</p>

	How is an orchard defined? How many trees? What size?	
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6 What are your views on Draft Policy SCE4: Local Food Production?

What are your views on Draft Policy SCE4: Local Food Production?

41 responses



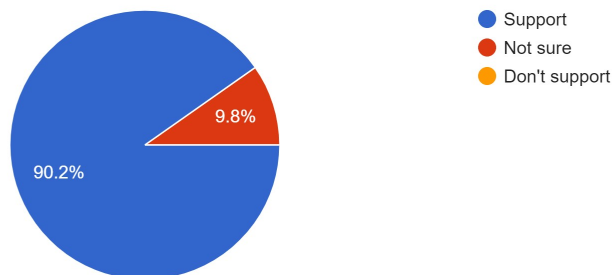
Rep No	Comment	Action Taken
6	Fine to support orchards and allotments, but more consideration should be given to good agricultural land.	Agreed and BMV land is protected in the NPPF
10	Unfortunately not much of the food produced in the Parish is suitable for local sale.	Noted
13	Vital that premium agricultural land is kept for agriculture.	Agreed and BMV land is protected in the NPPF
20	The reason I do not support this policy as I do not believe it is reflective of the views of the majority or residents. It is an ideological objective for a small number of residents. Those who have lived in the parish for any period of time will know there have already been plenty of existing opportunities for local people to grow local food. Allotments were been offered by local residents (large gardens) in the past but there has not been a demand. There are existing orchards which may benefit from additional care but we need to be careful that land set aside for trees does not affect open farmland space for protected bird species such as curlews. We need to protect our best and most versatile land by retaining it for farming (not allotments) to protect our country's food security.	Allotments – the survey showed a significant level of demand for allotments and should therefore be part of the NDP. Action to implement the delivery of allotments will rest with the Parish Council and a working group. We need the correct trees in the correct place. Agreed and BMV land is protected in the NPPF
22	The proposal to build on prime arable land should not be allowed. The fields behind our property is excellent arable land and produces very good crops each year.	Agreed
24	Allotment and community orchard provision can only be viable if	Agreed and this will be followed up by the Parish Council and a

	suitable land is made available.	working group
27	What is local?	Local references the Parish of Slimbridge
36	There are already plenty of opportunities for local residents to utilise existing land (one of my neighbours offered her paddock as an allotment a number of times and no-one came toward). I support reinvigorating existing orchards but not in favour of new ones on agricultural land that could be use for farming.	Agreed and offer will be followed up
37	very good idea - allotments, and to encourage more self-sufficiency and boost community spirit	Noted
38	Support the intent would like to see the evidence to support “need” for allotments when this has been stated for many years, when offered to residents these have not been used. Before approaching other land owners (who may have conflicting development views) I believe there will be opportunities to use residents gardens.	The support was demonstrated in the NDP Survey and will be explored by the Parish Council and a working group
41	I the point of this to keep local food production to encourage the local consumption of food produced in the parish, thereby cutting food miles (in particular by the final mile delivery)	Noted

7 What are your views on Draft Policy SCE5: Trees, Woodland and Hedgerows?

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41 responses



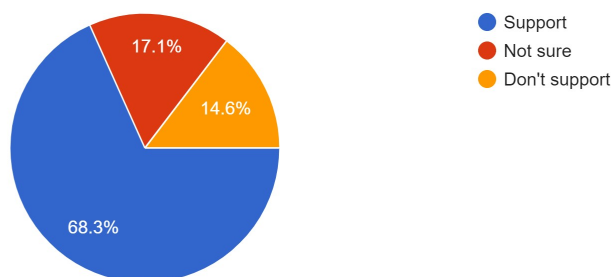
Rep No	Comment	Action taken
14	Existing woodland should be protected; there is so little of it in this parish.	Noted
15	Encouraging householders to plant native trees/shrubs for hedging (rather than the ubiquitous wildlife-poor Laurel, for example). Planting schemes for new developments should emphasise native trees/shrubs. More encouragement for farmers to manage their hedges to encourage biodiversity). I note this is mentioned in Part 3 Practical projects	Noted
20	Support but only where this relates to improving existing hedgerow enhance or existing woodland. do not agree with mass planting of trees on open farmland. This view is support by national organisations such as Natural England. Right tree right place, not any place!	Agreed
21	See answer to SCE3. Introduction of tree canopy and hedgerow cover needs to be carefully considered and can in no way mitigate for the loss of the open space required by those threatened species that are reliant upon the Severn Grasslands.	Agreed
22	Would be good for wildlife if the hedgerows could be left taller.	Noted
34	My only concern is that currently the miles of hedgerows in the parish are cut and managed to present a neat and tidy image to the Parish rather than for biodiversity or climate change. Hopefully this will change over time.	Wildlife Group could take action on this point
36	But has to be the right place for trees, I'd like to see existing hedgerows improved first.	Noted

38	I do not support large scale planting of new woodlands as it does not fit with our landscape (there are organisations such as as the WWT who are removing trees). Refer to the landscape maps from Stroud which explain the importance of retaining our landscape. I strongly support enhancing and lying existing hedgerows.	Agreed
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8 What are your views on Draft Policy SCE6: Renewable or Low Carbon Energy Generation in Slimbridge Parish?

What are your views on Draft Policy SCE6: Renewable or Low Carbon Energy Generation in Slimbridge Parish?

41 responses



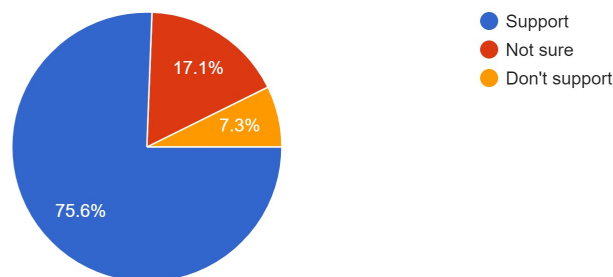
Rep No	Comment	Action taken
10	There is a very strong play for Community Renewable Projects. This not seem to be supported in the text and it is not clear why it is promoted so strongly.	See below Rep 20
12	Not sure what 'b ' under support means ! Does that preclude someone building a house with solar and keeping the energy the their own use ? It may be clear to the NDP group but it is not clear to a resident reading this.Needs to be rewritten	The regulations do not preclude this scenario but usually export to the grid is more cost effective.
18	Generally agree with all .From a personal point of view not in favour of further farmland being used for solar farms.	Noted
19	It is essential that this is developed and implemented in a truly sustainable and appropriate manner, and does NOT conflict with the other policy priorities. For example, the proposed development of a battery facility in the parish is wholly inappropriate.	See below
20	I do not support any plans for solar, wind or battery farm development. I do support solar panels on residential and commercial premises roofs.	There are several comments from consultees who support solar panels on roofs but are not supportive of community energy schemes or wind turbines.
21	Renewable/low carbon energy located on buildings such as solar panels on roof space or heat pumps within the property cartilage is acceptable. Solar and/or wind energy schemes owned privately or by the community are unacceptable if our desire to remain a rural community are to be achieved.	See above

	I strongly object to any support for on land wind turbines as discussed in 5A.2 p16 of the Draft NDP document.	
25	More should be done with regard to cars driving through Slimbridge to WWT. A free car park nearer A38 maybe at train station and a bus to WWT.	Noted
27	Make sure folk fully understand the look of the turbines	Noted
31	We should be open to new ideas/technology such as battery storage as this is widely considered as the missing link.	Noted
36	Support only retrofit on existing property (inc commercial) and new buildings only. No greenfield.	See above
37	wind/solar is not the right solution. Wind farms are noisy, inefficient, kill wildlife, not- recyclable. We need to investigate other "greener" solutions	See above
38	I do not support this apart from roof solar panels which we have. Farming fields should not be used for solar, wind or battery.	See above
41	No reference to wind turbines as referenced in %A.2. Where do these fit into the policy>	See above

9 What are your views on Draft Policy SD1: Locally Distinctive, High Quality Design?

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41 responses



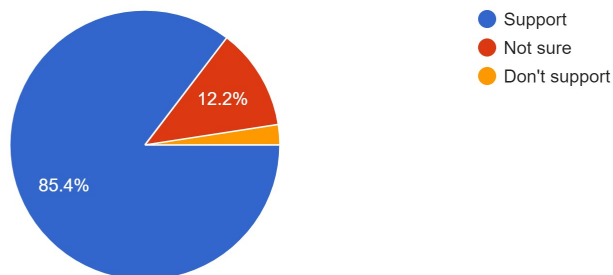
Rep No	Comment	Action taken
4	Agree that no large development should take place. However any new residential building I would prefer high density, since this is supposedly driven by housing need, use as little land as possible. Don't want to see 'luxury homes' on large plots with lots of space between them.	Noted
14	Most developers build what is most cost effective.	Noted
21	I support this proposal based upon the desire to have any new building positively respond the the local vernacular or have cutting edge design as appropriate that enhances the local area. Efforts to ensure homes are well insulated and efficient should be targeted to ensure they are economic, comfortable and convenient for residents.	Noted
24	What is locally distinctive? Slimbridge property doesn't appear to have a common theme with some infill construction appearing too big for its plot and aesthetically unattractive. This is an ideal opportunity to forge a theme so that any future development complements the area and isn't a cheap solution for the builder. Berkeley has a prime example of a new housing development that is neither locally distinctive or complements the existing landscape. Without a clear plan of what is distinctive and of high quality design then this can be open to interpretation by commercial builders.	This aspect is covered in the Slimbridge Parish Design Statement(Revised 2022). Slimbridge has developed organically over the years and should continue in the same way. For example building large homogenous estates is not acceptable. The overhead shot in the NDP of the church etc best illustrates why the Parish is special.
27	Will kill village in long run, as it will become a retirement / commuter village due to costs	This is the opposite of the intention of the NDP. It is acknowledged that most residents commute of of the Parish to work but the NDP

		encourages new companies and hence more jobs in the Parish
41	Whilst I agree in principle there are some egregious examples of developments which are out of keeping, which were explicitly described by Stroud District as being. in keeping with neighbouring and adjacent properties. Will the NDP make a difference?	The NDP will be a statutory document and defines what residents view as “in keeping”.

10 What are your views on Draft Policy SD2: Pre-application Community Engagement?

What are your views on Draft Policy SD2: Pre-application Community Engagement?

41 responses



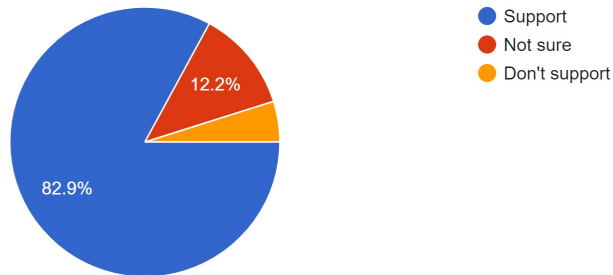
Rep No	Comment	Action taken
4	It is clear Stroud council have no intention of listening to local residents.	The NDP will be a statutory document and SDC have to use it in decision making.
10	Engaging with Slimbridge PC is fine, but ultimately the decision will be made by Stroud DC who can override Slimbridge PC.	See above
12	This adds another bureaucratic layer to an already long and stressful process. SDC should have the final decision and there is already a process for pre application in place with SDC.I am unsure what this adds to the process	This process occurs informally at the moment and this policy will simply formalise existing practice. By engaging at a local level, this should help resolve problems early. The process should be proportionate and is not mandatory.
13	Essential that local community has opportunity to assess impact.	Noted
14	Dubious on whether existing local views are listened to. Would a larger system be better??	This will help to take local views into account.
20	Agree, but should support the Gunning Principles. The community engagement should also include interest groups such history and wildlife.	Agreed
24	Proportionate and effective pre engagement. Please expand and define.	Text will be expanded to clarify.
25	Include retirement properties- housing association led.	Agreed
36	I am a member of local community groups and I think there should be more consultation from residents (not just the parish council). For example the history society and the wildlife group.	Agreed
41	But I am not sure what a difference this will make; see previous	Noted

	answer. Engagement is not the same as listening and taking comments on board.	
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11 What are your views on Draft Policy SD3: Sustainable Development to Meet Local Housing Needs?

What are your views on Draft Policy SD3: Sustainable Development to Meet Local Housing Needs?

41 responses



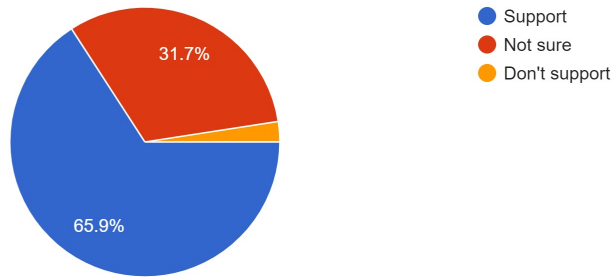
Rep No	Comment	Action taken
12	You are using a version of the settlement plan which is due to be changed in SDC Strategic Plan.I think this gives a false impression to residents as we already know that development has occurred in Dursley Road for instance.Maybe a comment should be included that the revised settlement boundary is due to be published in due course	A comment will be included.
13	But must be in keeping with character of the parish	Agreed
14	Small local developments are clearly needed every five years or so	Noted
20	Support on the basis it is for local needs within the parish and not beyond. Should be small extensions to existing settlements such as the one in Cambridge.	Noted
21	I am aware that there are a number of small areas that will become subject to development under this criteria if amendments to the Slimbridge Settlement Area proposed in the current draft Local Plan are approved. I am not necessarily against this but have not formed a firm view on how the qualification of any future residents should be assessed. Currently, Stroud District Council manipulate the rules to ensure they can allocate new housing almost without restriction from across the district. With this in mind either the NDP should aim to restrict to those qualified strictly within the Parish or accept a much wider qualification criteria.	Noted
24	Small and infill developments would benefit the Parish. However a	All of the policies in the NDP would apply to any future Strategic

	SDL seems somewhat irrelevant if SDC can bulldoze plans for a new settlement. If this settlement does go ahead, due to its size it would most likely not form links with either Slimbridge or Cambridge and remain independent. If residents from the new settlement wish to take advantage of the cultural and tourist facilities offered by Slimbridge this would most likely result in increased car numbers passing through the village and the parishioners would not benefit.	Developments and ensure that any such developments benefit current residents. See introductory text.
25	Include housing association retirement properties.	Noted
27	It doesn't address real need, just demand.	The need has been assessed by two housing needs surveys, one of which was independent.
36	I think this should align to the local needs for Slimbridge Parish only.	Noted – see above (Rep 21)
38	Yes for our small parish	Noted

12 What are your views on the Draft Policy SD3: Sustainable Development to Meet Local Housing Needs??

What are your views on the Draft Priority Statement: Strategic Development in Slimbridge Parish?

41 responses



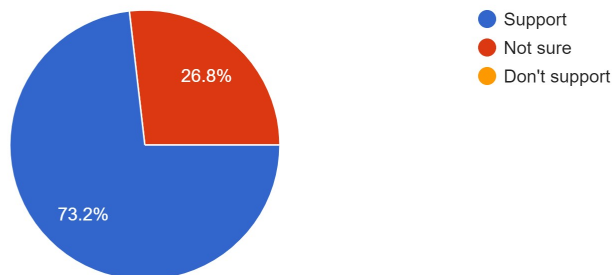
Rep No	Comment	Action taken
20	I strongly object to the proposed PS37 strategic allocation in the draft local plan. I support Slimbridge Parish Councils submissions to the various consultations. Due to the significant delays and issues with Stroud District Council local plan, the proposed site should have already been removed and therefore would not even be of mention to this NDP.	Noted
21	If Stroud District Council had followed correct protocol and responded to evidence and consultation responses site PS37 should have been removed very near to the Issues and Options consultation at the beginning of the process. However, SDC have ignored or manipulated the process at every stage to erroneously ensure PS37 currently remains. The site proposers have refused to meaningfully engage or answer relevant questions from Slimbridge Parish Council or residents. They have focussed on shallow and pointless PR stunts and tick box exercises instead aided and abetted by a compliant strategic planning department at SDC. Unless Stroud District Council is abolished and a competent Unitary Authority is created I have no faith that any measure to respond to residents justifiable wishes and ambitions would be recognised.	Noted
24	This is a good statement and a framework within which to work, but only if SDC accept it.	Noted

27	Its about not developing	Noted
36	I very strongly oppose a strategic allocation within the Slimbridge Parish. I understand the examination process starts in March and therefore the evidence presented by own community would lead to this being removed from the draft local plan.	Noted
38	I do not support the draft local plan with respect to the proposed development in our parish. I support the views of the parish council and Wisloe Action Group.	Noted

13 What are your views on Draft Policy SLW1: Community Facilities?

What are your views on Draft Policy SLW1: Community Facilities?

41 responses

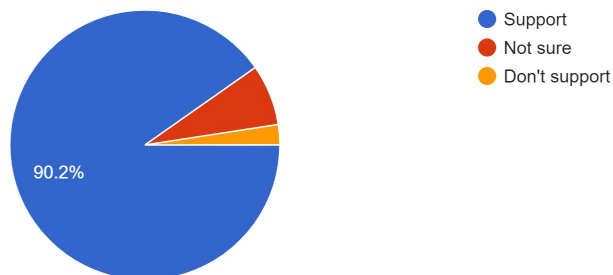


Rep No	Comment	Action taken
10	A Village Shop has been tried once, but it was not sustainable.	Noted
14	Very few facilities exist and the SLSC have a distinct bias against its existence.	Comment not understood
20	Facilities should also include privately run recreational services such as equestrian yards as these core to our rural community.	These are included in Figure 9
21	Where loss of one of the facilities included in Figure 9 is is being considered it should not become acceptable because another similar facility might exist elsewhere nearby.	Add to Policy: The loss of a facility is not acceptable because a similar facility is available in the surrounding area
22	These need to be preserved and improved	Noted
24	It is important to retain community facilities. A community/village shop would be a good addition and would give local people a meeting place and the opportunity to work/volunteer. Location is difficult in a linear village where there is no centre and some people would need to use their cars which somewhat defeats other objectives.	Noted
25	Tourist information hub including cafe and shop needed.	Noted
27	Fails to address who will fund.,	Noted
36	I would like to see the equestrian centre remain open as this is where I exercise my horses.	Noted
41	Further example is under sports facilities for adults as well as young people.	Noted

14 What are your views on Draft Policy SLW2: Local Green Spaces?

What are your views on Draft Policy SLW2: Local Green Spaces?

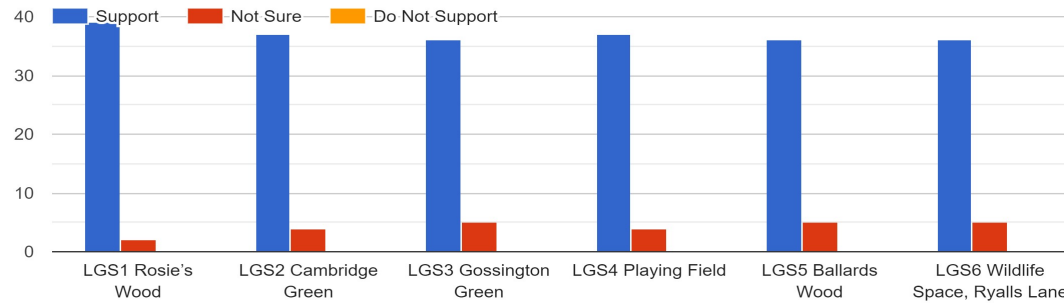
41 responses



Rep No	Comment	Action taken
14	All should be kept and maintained although if the churchyard ever comes under this, it is proving to be expensive.	Noted
15	The concept of Local Green Spaces is good - I have some concerns about one of the proposed LGS, detailed below	Noted
18	Very important to protect the local green spaces listed to retain the nature of the village and surrounds..	Noted
22	There is an area of copse behind Rocket Rentals that I think fulfills the criteria for being a designated Local Green Space. Although it is much smaller than LGS1/LGS6 I think it is very important as it helps with flood management, supports biodiversity and provides cooler shaded areas for wildlife. During the summer a family of deer were living in this area. With consultation with the farmer perhaps this area could be extended and improved.	The land owner did not wish the land to be designated.
27	It's modest, just the obvious one.	Noted
36	I would like the Gossington space to be a wildlife area.	Noted and SPC will follow up
41	What about the vacant plot between Winsford and Kingston Bungalow on Kinston Road?	SPC owned land and SPC will follow up

15 Please indicate your support for the suggested Local Green Spaces being considered designation in the Slimbridge Neighbourhood Plan.

Please indicate your support for the suggested Local Green Spaces spaces being considered designation in the Slimbridge Neighbourhood Plan.



Do you have any comments about any of the potential Local Green

Rep No	Comment	Action taken
4	Not enough of them	Noted
7	We need to protect our green space	Noted
9	FULLY SUPPORT GREEN SPACES WITHIN THE VILLAGE	Noted

15	<p>LGS6 Wildlife space, Ryalls Lane - I am one of the owners of this private wildlife area which is effectively part of our garden. Our original aim in 2000 when we bought this extra 2.5 acres adjoining our house was to create a wildlife area with a mosaic of habitats to complement what we had already started in our existing garden. Because there is a public footpath crossing the new area and because we were happy to share this new space we have established a permissive loop path, allow access to the bird hide we built and arrange badger watching there in the summer. We understand that LGS status can apply to privately owned land and the space does not have to be publically accessible. Our principal aim for this green space has always been to create and manage habitats for wildlife - not for people or dog walking. However provided people and dogs do not adversely affect our principal aim we have welcomed public access there - we want people to engage positively with nature and learn to value it more. 99% of people are lovely and we actively encourage walkers etc to enjoy the space and biodiversity.</p> <p>However there is now a marked increase in numbers , starting from the time of Covid lockdowns, now informed by social media , the surprise appearance of 'Ryalls Cottage Nature Reserve' on Google Maps, the mention in the 'Jubilee walk' (which we were consulted about and gave our agreement to), and simple, exponential word of mouth. The possible development at Wisloe could significantly increase the number of local residents looking for green spaces to enjoy. We want to maintain control over what is part of our garden and continue to prioritise nature.</p> <p>Would designation as a LGS create an expectation of unrestricted public access (whatever the official guidance states) ? Does the protection afforded by LGS status actually add anything? The likelihood of the area ever being developed is non existent. Could there be an unintended consequence of designation , namely even more people visiting, leading to the existing unrestricted access becoming problematic. It would be ironic if we had to consider stopping public access (save for the public footpath, of course) or be much more restrictive as to where and when people can go because of LGS status. We wish to be consulted directly about possible designation. much more restrictive as to where and when people can go because of LGS status. We wish to be consulted directly about possible designation.</p>	<p>You will be consulted directly as part of the designation process and your concerns are taken very seriously.</p>
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21	Those not currently used for recreation should be used to enhance the appropriate ecological and biodiversity of the Parish.	Noted
24	I regularly visit some the Green Spaces. We are lucky to have them.	Noted
40	These are all very special in their own way. We particularly value LGS1, LGS5 and LGS6. It is also vital to preserve LGS4. They should all be designated without doubt to support the objectives and vision.	Noted

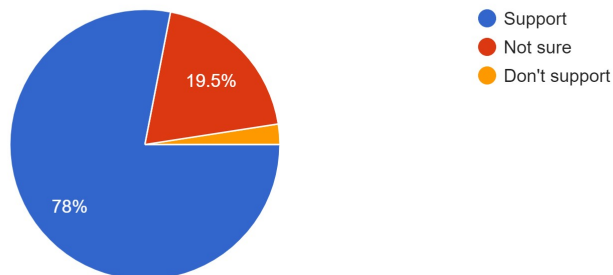
16 Is there a potential Local Green Space that is important to you that we have missed?

Rep No	Comment	Action taken
6	There is the small strip of woodland next to the Cam containing apple and plum trees through which the footpath from Cambridge to the motorway underpass runs.	This was investigated and the owner is not happy for it to be designated
7	Stables and land at wisloe	Only 4 years is left on the lease of the stables. The freeholder is GCC and because it is part of the PS37 proposal, it is most unlikely that GCC will agree to designation.
14	The churchyard?	Noted
36	1. The fields south of the Slimbridge roundabout (A38) provides a value farming landscape which is rich in wildlife including barn owls, snipe, grass snakes and curlews. 2. The fields on the right right and left hand side of Moorend land (from Gossington) are a refuge for European Cranes, egrets and wildfowl.	Agricultural land is not normally designated

17 What are your views on Draft Policy SLW3: Getting Around?

What are your views on Draft Policy SLW3: Getting Around?

41 responses



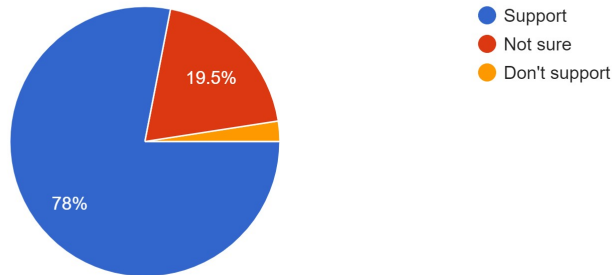
Rep No	Comment	Action taken
11	It is very difficult to use Cam and Dursley station. The Car Park is too small and for those unable to walk or cycle there is no alternative way of getting there. Even for walkers/cyclists the bridge over the railway is dangerous.	Noted and agreed
18	The continuing improvement of public footpaths and bridleways is to be encouraged. More cycleways difficult due to geography of the area.	Noted
20	There are footpaths and other rights of ways (to the east of the A38). Some are accessible over level crossings. These should not be lost as residents use these.	Noted
24	Slimbridge is fortunate to have an extensive network of footpaths and bridleways. However many of them are not easily accessible. Stiles are high, there are very few provisions for large dog access and there is no provision for disabled access. Even when stiles and accessways have been improved by the landowners they have not taken this into account. Ideally, a plan to convert stiles into accessible gateways would be good. Some landowners actively discourage people from using their footpaths. It is a shame that WWT and Cadbury (both of whom benefit significantly from the village, and in different ways cause adversity for the parishioners) don't offer to fund these simple changes to make these important spaces more accessible for all.	Noted and footpath group will investigate

25	Consideration should be given for the provision of scooters for the area. Quick , low energy transport alternative. Can be provided by private companies at the moment.	Noted – SPC to investigate
27	There are public buses. Either funding needs to support a useful bus service. OR we have to live with the FACT that cars and the need for parking will be THE mode of transport beyond very local walking	Noted and agreed
34	Whilst the Parish has a great many footpaths none are suitable for wheelchair access, with the only path so designated having fallen into disrepair. Our Parish Disability Champion has now moved away. The Parish needs to fill this post and prioritise the needs of the disabled	SPC will fill the post. Footpath group will investigate renovation of the Gravel Path
36	I would like to see more of a focus on rights of ways including bridleways. I walk my dog towards Cam and frequently use the paths from Gossington A38 over the level crossing towards the M5 (I can supply details). I also use the footpath at the back of Gossington wood which also passes over a level crossing which links up to the A38.	Noted
38	A very rural environment will always be car dependent	Noted

18 What are your views on Draft Policy SLW4: Local Economy?

What are your views on Draft Policy SLW4: Local Economy?

41 responses

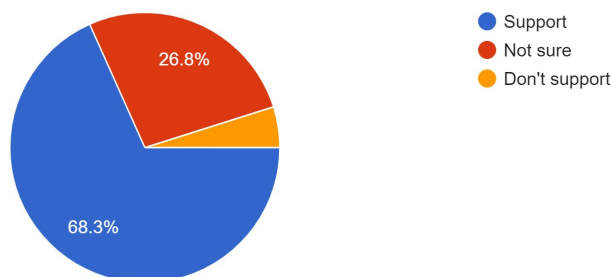


Rep No	Comment	Action taken
24	Home or hybrid working is now an important part of our lives. It is important to maintain a good work/life balance and therefore being able to work at home, but to keep work and home life separate is a good thing.	Noted
27	Looks more like fancy wording to say its not actually wanted, An area for local industry should be encouraged.	The policy states the exact opposite
41	Without the provision of adequate internet connections, this is a mute point. There isn't the infrastructure to support additional businesses,	High speed broadband is now available for most of the Parish and is available to support additional businesses.

19 What are your views on Draft Policy SLW5: Managing Tourism and Rural Diversification in Slimbridge Parish?

What are your views on Draft Policy SLW5: Managing Tourism and Rural Diversification in Slimbridge Parish?

41 responses



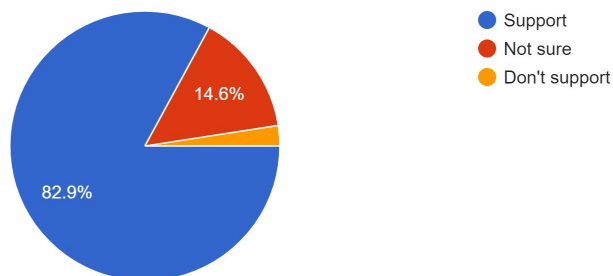
Rep No	Comment	Action taken
12	Rather difficult to always facilitate 'non car travel' when there is not a bus route from Slimbridge village itself and having to walk to A38, especially if people on holiday have young children	Noted
14	The current level of tourism in Slimbridge is causing many problems.	Noted
18	In agreement with all in DP SLW5-Relevant objective 0.19	Noted
20	Support however this should not impact residents negatively ie increased traffic, noise etc.	Noted
21	I generally support this policy but question what would be considered 'unacceptable traffic generation' and what 'measures to mitigate the impact of traffic generation including air quality' might be. Some clarification would be appropriate. This is particularly important if development at WWT brought about any increase in visitor numbers which already stress the local infrastructure and impose upon those living on the route from the A38.	Noted and Road Safety Group will investigate.
24	Whilst Slimbridge is a tourist destination, many parishioners do not benefit from it and the businesses that do, do not appear to want to contribute to village improvements or appear to consider the impact their business has on the people who live in the village. Traffic volume through the village is considerable. There is only one way in and one way out. Vehicles are large and roads are narrow, with	A tourism group has met and will continue to investigate the issues and put forward solutions.

	<p>no foot paths. Traffic travels too fast and there are no traffic calming measures. Entry to and from the village at school times is almost impossible.</p> <p>I feel that if tourism is to continue at current levels, or increase, then relationships with local providers need to be improved to encourage them to support the safety and well being of parishioners.</p>	
25	<p>A tourist hub with cafe and shop should be provided, hopefully by the tourism budget in local councils - county and district. Considering how WWT attracts so many people to drive down St Johns Lane, Slimbridge and contributes to the counties tourist trade! Something should be done for the village!</p>	Noted and SPC will follow up this interesting idea
27	<p>Fails to address the fundamental issue that most of the employment in the Parish is based on tourism. Slimbridge must recognise and subsequently manage the fact that its fundamental attractiveness leads to the tension of it becoming a Theme Park or Retirement Village. It should be neither.</p>	See Rep 24 above. Most of the employment in the Parish is not tourism based (see Businesses Report)
31	<p>WWT should be encouraged to have a car park close to the A38 and use electric buses to take visitors to the centre, removing most of the traffic from Slimbridge.</p>	See Rep 24 above
36	<p>I am support of business but we also need to consider the unique rural place we live it and not turn this into an urban environment.</p>	Noted
41	<p>There is not the infrastructure, namely the road is too narrow to support further expansion of tourism in the village. Electric cars cause more damage to the roads than conventional vehicles due to the weight differential. Coaches cause more damage to the verges due to their size.</p>	See Rap 24 above

20 What are your views on Draft Policy SLH1: Locally Valued Key Views?

What are your views on Draft Policy SLH1: Locally Valued Key Views?

41 responses



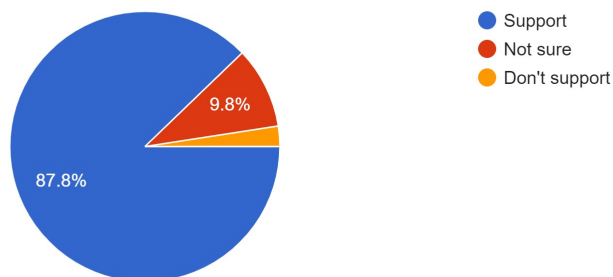
Rep No	Comment	Action taken
18	Agree with relevant objective :020	Noted
20	I wish to propose two valued view. From A38 walk down Tyndale Road past Hurst Farm. Look right and you will see a wide open view towards Slimbridge Church. From Gossington, take the footpath through the paddock of Lynwood towards the British Legion. From this footpath there are views Slimbridge Church.	Thank you – they will be incorporated
21	I am a regular user of the public rights of way leading from the A38 southeast of Lanes End Bungalow across over level crossing 46 on the railway then under the M5 underpass towards Cam. Looking back from this footpath towards Slimbridge and St John’s Church in a roughly northerly direction provides wonderful views which should be protected. They do not appear to be shown in Figure 11b.	Thank you – it will be incorporated
25	Essential. Do not want a very large refuse incinerator deemed acceptable in this beautiful area!	Noted
27	Just another way of ensuring there is no employment. All very nice views, but none are St Pauls Cathedral.	Noted
36	I would like to suggest the view from the footpath behind my home towards Slimbridge church as a key view. Also a similar view from the top of the bridleway (up from Hurst Farm) and from the A38 just past the Tyndale Road junction.	Thank you – they will be incorporated
41	I am sure there are more valued views than are recorded on these	Noted

	maps.	
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21 What are your views on Draft Policy SLH2: Heritage Assets and Archaeology?

What are your views on Draft Policy SLH2: Heritage Assets and Archaeology?

41 responses

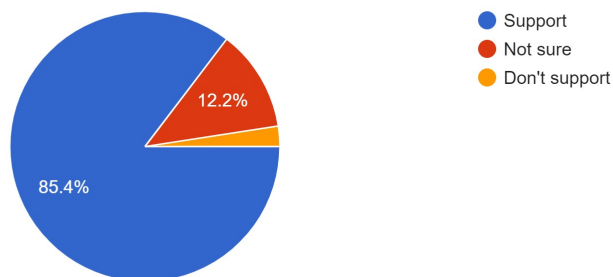


Rep No	Comment	Action taken
6	As the A38 is a roman road, fields adjacent could have archaeological relevance.	Agreed – it will be added
21	I note the areas of Lighten Brook, Lynch Field and Stanborough Mead. referenced as containing unidentified remains. However, nothing is mentioned of the fields southeast of the A38 between Gossington Bridge and Slimbridge Roundabout which are currently subject to the proposed PS37 site. There are known Roman archeological remains and a suspected high grade Roman Settlement in this area as reported from Gloucester County Council survey and archives. This field should also be included within this policy.	Agreed – it will be added
36	I am a member of the history society and support the work they do to protect our heritage. Any development proposed should be referred to the society for review (as well as the council) as there are many sites which are known to be nationally important and not yet surveyed.	Agreed

22 What are your views on Draft Policy SLH3: Locally Valued Non-designated Heritage Assets?

What are your views on Draft Policy SLH3: Locally Valued Non-designated Heritage Assets?

41 responses



Rep No	Comment	Action taken
10	The War Memorial has been omitted. It should be listed with English Heritage	It will be investigated for inclusion
20	There are missing ridge and furrow fields which should be added to the plan. I have a number if these I can supply. One example is the field to the north of Manor Farm, Gossington bordering the A38. This land supports protected farmland birds throughout the winter.	These will be incorporated
36	I am fortunate to be able to ride and walk across our wonderful parish and I would like to protect the ridge and furrow. Existing records can be located via the Heritage Gateway map (as well as local knowledge we can provide). Existing orchards should also have a special local protection. In addition there are some key focal trees which I think should be protected.	Orchards and trees are covered in other policies

23 Are there any comments you wish to make about the practical Projects in the draft NDP?

Rep No	Comment	Action taken
6	More work needs to be done to clear overgrown footpaths.	See projects section and Footpaths Group
11	All sound good	Noted
12	Many people have been very busy and it is good to see the progress that has been/ is being made on behalf of the residents	Noted
15	Wide ranging and aspirational	Noted
20	I support local projects that enhance our parish for local wildlife and local residents. There is lots of of good work that many residents support through volunteering such rubbish clearing, opening up existing rights of way and wildlife enhancement. I do not support projects that are an ideologically driven by a minority in my community.	Noted
21	Generally supportive of local projects, particularly those that add to or maintain the rural nature of Slimbridge Parish and enhance biodiversity whilst engaging the community. Projects that specifically target protecting the species of particular conservation concern present in the Parish, such as Curlew and Lapwing, would be valuable. I question the need to agree or obtain new land for allotments as previous surveys have revealed there is little or no interest.	Noted
23	No, I am in full support of this initiative.	Noted
27	The Patch Car Park. Remove the overnight parking restriction. There are options to ensure day time parking is free and overnight parking is not.	Noted and action is with SPC
31	Support.	Noted
32	If implemented then the parish will be a richer place in which to live.	Noted
36	I think projects should reflect the local community requirements. I am slightly concerned on the focus of some of the suggestions which could “urbanise” our wonderful parish.	Noted and the aim is to ensure the Parish is not urbanised.
40	They all look to be good and support the overall vision	Noted
41	Perhaps the PC land planted with trees could be considered (again!) for a community orchard - the badgers have gone.	Noted

24 Which parts of the draft NDP do you most like and why?

Rep No	Comment	Action taken
6	Its a good start.	Noted
7	Sustainability	Noted
8	Comprehensive document	Noted
10	Section 5d and 5E most interesting	Noted
12	Plans and photographs- good to have a visual explanation	Noted
13	An excellent document	Noted
18	No preference	Noted
21	Practical positions in alignment with a majority of residents. Proportional, organic development of the community whilst addressing real, everyday concerns including maintaining viable businesses, farming and food production, protection of the environment and ecology, managing potential flooding and ensuring that limited, organic growth can adhere to the build better built beautiful principles.	Noted
22	SLW2 The local green spaces because this will help to protect the green spaces that are left*	Noted
23	Green spaces, landscape and heritage and Locally Distinctive, High Quality Design.	Noted
24	The concept is good. It is important to have a plan for the community but there are no timescales and no guarantee that the views of parishioners will be considered when important planning and cultural decisions are made.	The views of the community are reflected in the NDP which will be a statutory document and will be used to determine planning decisions. The timescale covers the period to 2040.
28	Breadth of topics	Noted
31	Flood management, essential in the future, goes hand in hand with trees, hedgerows and biodiversity.	Agreed
32	I like the parts regarding the environment and biodiversity. I feel that more care should be taken of our surroundings.	Noted
37	focus on sustainable devt, whilst retaining the character of the community, something Wilsoe proposal would destroy	Noted
40	The parts that aim to preserve the heritage and those that support wildlife and the environment. This is important for future generations	Noted

25 Which parts of the draft NDP do you least like and why?

Rep No	Comment	Action taken
10	5A, 5B, 5C too technical and jargon laden	Noted but it is difficult to produce a precise document without recourse to technical terms. Perhaps a glossary is needed?
18	All relevant and of interest.	Noted
20	Reduce the climate emergency objectives. I do not believe these are the highest priority for the majority of residents.	Noted
21	Too much focus on and reference to climate.	Noted
23	Having supported this, I am not sure it always works - Sustainable Development to Meet Local Housing Needs, it is never appreciated or looked after.	Noted
24	Filling in this form has been time consuming and onerous. It is not a 15 minute job. It needs to be read in conjunction with many other documents, many of which repeat themselves and are not easy to find. I have spent over 5 hours on this. I suspect many people will tick boxes without accessing the relevant documents, which makes any responses somewhat irrelevant.	Noted but the document and supporting evidence needs to be comprehensive
28	None	Noted
36	Community lead renewable energy - no greenfield!	Noted
37	Focus on car charging hubs	Noted
38	Renewable energy proposals	Noted
40	It is very detailed and a lot to absorb but we understand the need for this format and making sure the intent is conveyed correctly	Noted
41	Tourism – visio and policy. As stated in the response, the village does not have the infrastructure to support the current levels of torism let alone any increase.	Noted

26 Which parts of the draft NDP could be improved and why?

Rep No	Comment	Action taken
7	More emphasis on maintaining the identity of individual hamlets in parish	The documents stresses the importance of this matter
12	Page 32 - unclear as what exactly 'b' under ' support' actually means! Can you make this more clear	See earlier comments
18	Would be nit picking to suggest any.	Noted
20	Some suggestions provided in answers. In addition, I would like to see focus on retaining and improving our dark skies to support residents health as well as significant ecology benefits. Damaging examples include the lights on the A38 and those at the recycling centre. Removal of any NDP support for battery or solar development except on the roofs of buildings. Removal of NDP support for any wind development. Improve provision for existing biodiversity to be supported and enhanced rather than planting more trees, particularly when they put in the wrong places. Following the planning inspectorates examination in public next week, consider the impact of the removal of ps37 from the draft local plan.	Noted and text will be added Noted Noted Timing could be a problem. The intention is to submit for Reg 16 before the examination is complete
22	* No mention of re-wilding has been made in the plan. It would be good to plant more trees and improve hedgerows.	Noted but re-wilding has not been raised up till now.
23	Community Facilities, I like the shop/cafe initiative but we must keep a/the post office too.	Noted
24	There are no timescales. It appears to be a document with ideas but not much else. No costings or indication whether there is truly any village 'buy in'.	The views of the community are reflected in the NDP which will be a statutory document and will be used to determine planning decisions. The timescale covers the period to 2040. Village 'buy in' demonstrated by high support rate.
27	Noting where the policies conflict. Retaining important views and Solar and Wind developments. for instance.	Noted
31	I think it should be mentioned that the canal is actually a flood risk to the whole parish and needs to be constantly monitored for leaks/ damage. It should be noted that it is 200 years old and in future pressure needs to be kept on C.A.R.T. to carry out regular maintenance and surveillance.	Noted

38	Remove renewal energy proposals. Include provision to reduce light pollution. Protect land which supports protected species.	Noted – see earlier comment on dark skies
40	None - We think the authors and reviewers have done a really tremendous job and are grateful for their time and energy to create it	Noted
41	I think copies of the Plan should have been available for people to borrow in order to read and digest it's contents. I think that may have impacted on willingness to complete the questionnaire. A lot of work has gone in to this, thank you.	Noted and for the Reg 16 consultation copies will be available to borrow.

Email and letters

Rep No	Comment	Action taken
42	I have been in contact with XXXX who has informed me about the flooding issues on St John's Road which are marked with blue dots on the NDP. As far as I know XXXX has never been flooded and we have documents to prove this from Severn Trent water. We purchased the house in 2020 and a thorough flood report shows that is area is at very low risk of flooding. Please could you keep me informed of any future issues and let me know the outcome as we do not want incorrect information being in the public domain	Reference to individual properties is removed.
43	The policy also refers to 'locally valued' trees, hedgerows and woodland etc. How will the term 'locally valued' be defined and on what basis will this be determined? Will it be clear to developers and local communities what is 'locally valued' in addition to those assets which are already protected. c. There is no description as to what constitutes a 'locally valued' tree, and as such, it is not possible for either a developer, the local community or indeed the Authority to effectively implement this element of the policy. This lack of clarity is particularly challenging for a developer considering the acquisition of a site or preparing a planning application without certainty over which landscape features would be protected by statutory policy.	Definition is available and will be added
44	I have noted that on the map our house XXXX is identified as one which has suffered flooding in past and would advise that since we moved here in 2007 we have not suffered any flooding so not sure where this info has come from? And wouldbe grateful if this could be amended accordingly.	See Rep 42 above.
45	While attempting to respond to the NDP yesterday I noticed in the Natural Flood Management section that my house, XXXX St John's Road, has a blue circle on it indicating 'Flooded property'. Further investigation has taken me to another document on the Parish Council website that also shows this: https://slimbridge-pc.gov.uk/wp-content/uploads/sites/4/2023/01/Flooding-Report-Reg.-14.pdf I have lived in this property since it was built in 1984 and it has never flooded. The same is true of the properties on either side of mine, XXXX and XXXX, and also XXXX and XXXX that were	See Rep 42 above.

	<p>built around the same time. None of these properties has ever flooded. My property is about a metre higher than the road making flooding very, very unlikely. All the Glebe fields would need to be flooded to a depth of at least one metre before there was any chance of any water even getting onto my driveway.</p> <p>Both of these documents are therefore WRONG. What is the source of this information?</p> <p>I would urge you to correct both documents as soon as possible as well as go back to the source of this information and correct that too. As you will appreciate, having incorrect information like this in the public domain is very concerning. I intend to sell my property within the next 5 years and information like this is likely to adversely affect the value of my property.</p> <p>I am also concerned that the photos in the document that show flooding in Slimbridge Parish. Most of this flooding resulted from poor maintenance of the drainage infrastructure which I can explain to you incident by incident. For example, the 'flood' on 23 December 2020 was due to there being a blockage in the culvert under the A38 that caused water from the brook to build up on the A38 near Rocket Rentals. Among other things, they had recently laid a concrete apron that had reduced the absorption of the land close to the brook that borders their property. When the fire service cleared the blockage in the culvert, a vast amount of water was sent down the Lighten Brook behind the school some of which broke out by XXXX and came down the road. This water flowed for about half an hour after which there was no evidence of surface water. The flooding of Penny Lane is a water table issue but this is low lying land where there are no houses.</p> <p>The flooding at Kingston Corner has arisen from the road surface being re-laid incorrectly so that the drain is higher than the road.</p>	
46	<p>I refer to Figure 3b on page 24 of the NDP. This is headed Surface Water Flood Risk.</p> <p>I have two points to make. Firstly my property, XXXX, is identified on the plan under the caption 'Flooded Properties' . This is incorrect and we have never been flooded in the 35 years of our occupation. You will appreciate that misinformation of this nature would be severely detrimental should we decide to sell our property and I would appreciate the 'blue dot' being removed.</p>	See Rep 42 above.

	<p>Secondly I suspect that the 'recorded flood events' related to the XXXX sewers being inundated with stormwater which has now, hopefully, been resolved. For your purposes it might be prudent to only identify properties that had surface water entering their buildings.</p>	
47	<p>Here are my comments on the Neighbourhood Development Plan. I agree to my personal details being used in connection with these comments.</p> <p>I commend the team that has produced this document. They have clearly done an enormous amount of work and produced a well-structured document that is easy to read and understand.</p> <p>I raised at a previous consultation that when considering housing need, the plan should not consider just local people but also those who have no tie to a particular area such as military veterans. To this example should be added refugees. This draft does not appear to have taken account of this comment. I still think the village should welcome those with housing needs from outside the local area and therefore object to the focus on local need starting in the forward on page 1; continued in the Vision on page 10 and occurring in many places throughout the document. Having lived in many places within the UK and some abroad, the most pleasant are those where everyone is welcome and there is no barrier put up to newcomers.</p> <p>I have referenced the following comments to specific paragraphs, policies or objectives.</p> <p>Paragraph 2.5 – I strongly support the view that the facilities in the village cannot be described as good.</p> <p>Figure 2 The strategic cycling route from Frampton could become a significant way for visitors to access the Wildfowl Trust. It should continue along the canal from Cambridge Arms Bridge to Patch Bridge to encourage access by bike, rather than the inland loop that would deter people from using this environmentally friendly mode of transport.</p> <p>We should encourage staff at the Wildfowl Trust to live in the village in order to reduce commuting distances and make cycling to work more viable. Under key opportunities on page 9 ‘Harnessing the creation of Cam, Dursley and Uley Greenway; an opportunity to provide safe, active travel links between Slimbridge Parish and Cam</p>	<p>Working Group has been established on tourism</p>

	<p>and Dursley Station’ appears focussed on people commuting out of the village. It might be better phrased as ‘Harnessing the creation of Cam, Dursley and Uley Greenway; an opportunity to provide safe, active travel links between Slimbridge Parish and Cam and Dursley, including access to the Station.’</p> <p>Page 11, Objective O.6 – We need to be bolder and do more for the climate emergency by encouraging all renewable energy schemes, not just those that are community led. I would rather this objective said ‘Encourage initiatives for renewable energy schemes.’</p> <p>Page 21, Draft Policy SCE2 – Good. I am pleased to see we are prioritising energy efficiency over historic preservation. The fact a building is listed should not stop the fitting of solar panels as protecting the world is more important than protecting a building’s appearance.</p> <p>Page 27, Draft Policy SCE4: Local Food Production – There is already incredible amounts of bureaucracy around planning applications that wastes much money and time. I don’t support the first half of this policy which adds considerably to this burden.</p> <p>Page 30, Draft Policy SCE5: Trees, ... - Similarly to the last point ancient trees are covered in national planning policy (see Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk)). Including the first two paragraphs in the local plan is adding unnecessary bureaucracy.</p> <p>Draft Policy SCE6 or SD1 – The parishes declaration of a climate and ecological emergency would be supported by the policy stating that all new development must include its own renewable energy generation.</p> <p>Draft Policy SLH1: Locally Valued Key Views – I don’t like this whole concept due to its woollyness. What is a significant adverse effect is so subjective and seems like an excuse for a councillor to reject anything they don’t like. I would rather see this whole section scrapped.</p> <p>In summary, I am pleased to see strong support for measures to tackle climate change. I am disappointed at the xenophobia . I am concerned that the plan adds to bureaucracy and the money and time wasted on planning applications.</p>	<p>Will change the text</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>For the purposes of this reply, xenophobia is defined as: Attitudes, prejudices and behaviour that reject, exclude and often vilify persons, based on the perception that they are outsiders or foreigners to the community, society or national Identity.</p>
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In formulation and carrying out the tasks to complete the NDP we have endeavoured to ensure that all voices have been heard and where special needs have been found support has been offered. All information has been set out in clear type and delivered to all households. Public meetings have been held in a disabled accessible village hall with a hearing loop.

For the completion of our survey, held from 4 to 31 March 2021 and the Regulation 14 consultation, held from 23 January to 5 March 2023, we were made aware of specific living situations that needed to be addressed:-

Longlands - a small long term adolescent unit for troubled younger adults with psychological and behavioural difficulties.

Gladstone Clinic - an residential detox and rehabilitation centre for those with alcohol, eating disorders, gambling addiction and substance abusers.

Roselea, - residential accommodation for people with learning disabilities, autism and complex health needs.

These institutions were visited and the staff informed of the purpose of the consultations and invited to consider the needs of their residents in the completion of the forms and informed as to how further forms could be obtained if needed.

We are also aware that there is a small community of 'liveaboards' on the Sharpness and Gloucester canal, consisting of boaters who are on permanent moorings or continuous cruisers, for whom Slimbridge is an important mooring stop. We approached this group by both leaving copies of the consultations in the Black Shed and by approaching boaters in residence at the moorings when the forms

		<p>was distributed.</p> <p>The full analysis of the completed survey forms therefore took into consideration any response from these quarters which is encompassed within the final report.</p> <p>Parish Information from the 2021 Census released on the 28th March 2023 is divided into two areas. One based on the village of Slimbridge and the other on the village of Cambridge, together they cover the complete parish and adhere to parish boundaries.</p> <p>Slimbridge Area: 98.9% identified as White: 0.8 identified as Asian: 0.3% identified as other ethnic group</p> <p>Cambridge area: 98.7% identified as White; 0.9% identified as Asian: 0.4 identified as Black:</p> <p>Gender identity; the same sex as registered at birth. 97.03%</p> <p>Gender identity; different from sex registered at birth 0.02%</p> <p>Not Answered 2.8%</p> <p>NB. There was a slightly higher % of people identifying with other identities in both Stroud and the other towns in our district. Slimbridge Parish has a lower diversity range than the County (87% white) and Constituency (96.2 white) which may be explained by its rural setting, lack of industry and an elderly population. There is however no way you can postulate from this that we would be less welcoming to new residents from wherever ethnic or other background from which they derive, indeed the fact that we are home to three residential units for those with complex needs points in the opposite direction, that we are able and willing to take in those who have diverse needs.</p>
48	Please do continue to consider how this development can promote	Noted

	<p>held by the HER. For instance, for HA15 there is mention of a possible medieval labyrinth found by dowsing named “Troy Town Labyrinth” as number 15 on the local list but yet no mention of the nearby possible deserted medieval village which has visible earthworks (HER 4109). Whilst it is for the neighbourhood to draw up its own list of locally valued undesignated heritage assets we do feel that a full assessment of the archaeological sites as listed on Slimbridge Parish Historic Environment Record should be included in the plan, as set out in Historic England’s guidance https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/</p> <p>The archaeology department would be happy to advise further on the matters raised.</p> <p>If you would like to discuss any of the points raised above, please do not hesitate to contact me.</p> <p>Minerals and waste</p> <p>M&W officers have reviewed the consultation information and at this time do not consider it likely that materially significant mineral and waste impacts will emerge as a result of implementing the consultation’s proposals. M&W officers have based this response on potential impacts relating to: - Gloucestershire’s mineral resources; the supply of minerals from and / or into Gloucestershire; and the ability of the county’s network of waste management facilities to operate at its full permitted potential M&W OFFICERS RAISE NO OBJECTION</p> <p>M&W officers have reviewed the consultation information and have no further comments to make</p>	<p>by the Canal Bridges) and the extensive Ridge and Furrow field markings. Alongside this we have referenced and made available a copy of the Gloucestershire HER record for Slimbridge.</p> <p>We will be in contact to examine how an update of the HER for Slimbridge could be made into a Project if we can find a suitable volunteer.</p> <p>Noted</p>
49	<p>The Coal Authority is only a statutory consultee for coalfield Local Authorities. As Stroud District Council lies outside the coalfield, there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans.</p>	<p>Noted</p>
50	<p>5B Strategic Development in Slimbridge Parish</p> <p>Section 5B of the NDP discusses the proposed site allocation at Wisloe within the Stroud District Local Plan which is currently proposed to undergo Examination in March 2023. The mixed-use allocation is for circa. 1,500 dwellings and circa. 5ha of employment amongst other uses.</p>	<p>Noted</p>

	<p>We note the intention to ensure that the NDP provides a policy framework to ensure that if the Local Plan is adopted and Wisloe becomes an allocated site, it is delivered in a sustainable manner to the benefit of Slimbridge Parish as set out in Slimbridge Parish Design Statement. National Highways supports the provision of sustainable development which includes the promotion of travel by non-car modes. This is in accordance with net zero-carbon principles and reductions in car ownership and car use helps to improve highway safety and capacity on the SRN.</p> <p>Draft Policy SLW3: Getting Around</p> <p>We are supportive of this policy regarding promotion of active travel and enhancing connectivity across Slimbridge Parish, as it aligns with NPPF sustainability and net-zero carbon emission principles. This contributes to reducing the demand on M5 Junctions 13 and 14 and therefore potentially contributes to improve highway safety and capacity on the network.</p> <p>Draft Policy SLW4: Local Economy</p> <p>For new businesses, we note the requirement within Draft Policy SLW4, that new businesses will be supported in principle subject to an assessment of the impact of proposals on the transport network and parking conditions. However, we request that this policy is modified to state the following:</p> <p>“The provision of local employment, the expansion of the Parish’s small employers and the establishment of new start-up businesses will be supported in principle, subject to an assessment of the impact of the proposals and that any severe impacts resulting from the proposals are appropriately mitigated on:</p> <ul style="list-style-type: none"> a. residential amenity; and b. the transport network and parking conditions;....” <p>This policy change will ensure that the demand on the SRN is managed appropriately and that the SRN continues to operate safely and efficiently.</p> <p>We provide our continued commitment to work with Slimbridge Parish Council to work to successfully delivery of the NDP for the community. Please do contact us to discuss moving forward on the matters above.</p>	<p>Noted</p> <p>Change will be made</p> <p>Noted</p>
51	Natural England does not have any specific comments on this draft neighbourhood plan.	Noted

52	<p>There are no comments on the Plan that we wish to submit other than to congratulate your community on the preparation of the Plan itself and its locally informed policies designed to protect and enhance the area's distinctive historic environment.</p>	Noted
53	<p>The Bristol and Gloucester rail line (BGL2) runs through the Neighbourhood plan area.</p> <p>Any development likely to neighbour the railway such as the strategic allocations in Wisloe (Policy PS37) should consider noise and vibration for future residents from the operational railway. Where development may cause an increase of footfall at nearby stations, the plan should consider any necessary station improvements such as improved signage and car and bicycle parking.</p> <p>As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.</p> <p>We trust these comments will be useful in the preparation of the forthcoming plan documents.</p>	Noted
54	See attached document	
55	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the</p>	SDC Policy EL11 covers sports facilities and will be implemented in the NDP

NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.
<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>
PPG Health and wellbeing
section: <https://www.gov.uk/guidance/health-and-wellbeing>
Sport England's Active Design
Guidance: <https://www.sportengland.org/activedesign>

56	<p>Policy 06 - Renewable generation:</p> <p>a. Part b - There are a huge number of external factors that impact on the ability of a scheme to meet this aspect of the policy. While adverse impacts should be minimised/mitigated, they may not always be completely avoidable. If it is the desire of the community to have renewable projects, this paragraph may need to be amended.</p> <p>b. Second para, Part a - Particular support will be given where the energy is supplied directly back to domestic property, or buildings in the district. This is often not feasible, being controlled by the relevant grid authority.</p> <p>3. Policy 014 – Local green space. We would just like the ownership of LGS3 to be confirmed. We have liaised previously with the parish council relating to tree safety work there but believe that Land Registry has it registered to the Trust.</p> <p>4. Page 52 – There are multiple references to the archaeology at Stanborough Mead which is positive and should be included. This field is owned by the Trust and we have been supporting the ongoing archaeology works. Policy 021 relates to development nearby which could make it challenging to gain permission for any future farm buildings which may be necessary for normal business development. We assume that agricultural and business demand would still hold significant weight. All factors would need to be considered.</p> <p>5. Page 63 – Para 6.4 – allotments - The Trust owns one field that borders Slimbridge, some of which we have already agreed to being used for a footpath to the school, in conjunction with the farming business.</p> <p>6. Whilst there is reference to the importance of access to the countryside, the Trust would be willing to discuss this point and to promote a greater understanding of the benefits of learning from the outdoors. We acknowledge that our key delivery site at Redwood is outside the Parish boundary.</p> <p>Local green space report:</p> <p>1. LG3 – identified as potential for green space designation. Ownership to be confirmed.</p> <p>2. LG7 – identified as potential for green space designation. Ownership to be confirmed.</p> <p>3. LG13 – this is a large agricultural field, which we would not want</p>	<p>Noted</p> <p>LGS3 is owned by the Parish Council</p> <p>Noted</p> <p>Agreed</p> <p>Noted</p> <p>Noted</p> <p>LG3 is owned by the Parish Council</p> <p>LG7 and LG13 found to be not suitable for designation</p>
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	designated as an open or green space. It would be detrimental to the farm business and therefore definitely cannot be supported.	
57	<p>For Wisloe, the masterplan and Draft Design Code set out defining principles which help guide how a sustainable community of new homes, jobs, a primary school and community spaces can be created.</p> <p>It is welcome that the Draft Neighbourhood Plan, alongside the Parish Design Statement, reflect on how qualities and locally distinctive characteristics should be reflected in development proposals.</p> <p>We also welcome Draft Policy SD2: Pre-application Community Engagement as a means to ensure effective local participation in planning decisions. Our approach to engagement on Wisloe at this early stage of the project aligns firmly with these principles.</p> <p>Practical Projects identified in the Draft Neighbourhood Plan (Chapter 6) provide practical ways in which the key themes and policies of the Neighbourhood Plan can be delivered. Specifically, reference to addressing the climate emergency, provision of allotments and orchards and improving walking routes are key principles are set out in the Wisloe Draft Design code.</p> <p>The Draft Neighbourhood Plan and the Wisloe masterplan and Draft Design Code are aligned in many key areas and principles of good design. This alignment is an important factor in the development of an exemplar new settlement at Wisloe which also contributes to achieving district-wide Zero Carbon targets.</p> <p>Ongoing community engagement</p> <p>The Ernest Cook Trust and Gloucestershire County Council acknowledge the Draft Slimbridge Neighbourhood Plan's potential to foster local involvement and meaningful engagement in future planning decisions.</p> <p>They would like to remain involved with, and capitalise on, the synergies between the ambitions of the Neighbourhood Plan and achieving high-quality outcomes at Wisloe. We look forward to future discussions with you on this important point</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
58	We are aware of that sometimes the popularity of the canal cause problems for residents of the parish and we remain committed to working with the Parish Council as necessary. We are also aware of the draft proposals put forward as part of the District's proposed	Noted

<p>Canal Strategy. These will require further discussions with both the District and Parish Councils in due course.</p> <p>Please find below the Trust's detailed response to your draft Neighbourhood Plan. We hope that the comments provided are clear and helpful and that you are able to address and minor suggestions.</p> <p>Planning Policies</p> <p>Draft Policy SCE3- Natural Capital and Ecosystem Services</p> <p>The Trust support policy SCE3. However, the Canal & River Trust request that the Gloucester & Sharpness canal is mentioned in paragraph 5A.27 such as</p> <p>‘From the internationally important wetlands of the Severn Estuary designated Ramsar site, Gloucester & Sharpness canal to our roadside verges and garden ponds; our green and blue assets are all connected and provide a wealth of different benefits.</p> <p>Draft Policy SCE6 Renewable or Low Carbon Energy Generation in Slimbridge Parish</p> <p>Canal water can be used to provide a net zero form of heating and cooling for new development. Although there will be limited opportunity to use the canal in this way in the parish any new development of a suitable scale should consider this option. This should be added to the list of renewable technologies mentioned.</p> <p>Draft Policy SD1- Local Distinctive High Quality Design</p> <p>The Trust supports this policy. The Trust have produced guidance on what we consider to be good waterside design. Although there is unlikely to be large scale development adjacent to the canal the guidance should be promoted.</p> <p>The following guiding principles should be taken into account so</p>	<p>Text will be modified</p> <p>Text will be modified</p> <p>Text will be modified</p>
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	<p>that, where appropriate, new waterside development should:</p> <ul style="list-style-type: none"> • positively address the water. • integrate the towing path and open up access to the water. • link waterside space and the waterspace. • use the waterspace itself. • incorporate access and other improvements. • engage with and tease out the qualities and benefits of being by water. • reflect the scale of the local waterway corridor to the wider neighbourhood. <p>Draft Policy SLW3- Getting Around</p> <p>The Trust will continue to seek funding for and promote improvements to the canal towpath to improve it as an active transport route in both directions.</p> <p>Draft Policy SLH1- Locally Valued Keg Views</p> <p>The Trust is pleased to note that views to, from and along the canal are recognised as key views. Draft Policy SLH3- Locally Valued Non-designated Heritage Assets</p> <p>We are pleased to note The Gloucester & Sharpness canal is identified as a Locally Valued Non-designated Heritage Assets (HA16) however please correct the name of the canal on the map key and in the policy.</p>	<p>Text will be modified</p> <p>Noted</p> <p>Text will be modified</p>
59	(SDC) See full comments at the end of this document	
60	<p>We own the land and created the woodland you refer to as LGS Ballards Wood in the plan. We are very pleased to hear it is being proposed as a Local Green Space. However it is not called Ballards Wood. The correct name is Humpty Dumpty Woods so please can you ensure this is corrected as below. Thank you. We have no other comments.</p> <p>Page 44</p> <p>Local green space designations:</p> <ul style="list-style-type: none"> • LGS1 Rosie’s Wood • LGS2 Cambridge Green 	Text will be modified

	<ul style="list-style-type: none"> • LGS3 Gossington Green • LGS4 Playing Field • LGS5 Ballards Wood change to Humpty Dumpty Woods • LGS6 Wildlife Space, Ryalls Lane <p>I see it is referred to as Ballards Wood in other places too so please could you get changed. For example Local Green Space Report DAFT</p> <p>5. Ballards Wood Private owner. Landowner has responded in Area of woodland on both sides of footpath CSL30 Outside of settlement boundary. Deciduous woodland. Yes, Yes. Although outside of the settlement boundary, this T,R,W- An undisturbed area for wildlife with an added footpath used by dog walkers and people accessing from Subject to consultation with wider community, could be suitable for Local Green Spa</p>	
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Rep No	Approve	Don't know	Disapprove	Comment	Action taken
61	1			Good idea rather complicated to complete. A single sheet would be good	A mini guide was produced and distributed to all households
62			1	Nothing about Cambridge / A38 traffic calming. Impossible to pull out onto A38.	Road safety group will investigate
63	1			Too complicated to fully understand	A mini guide was produced and distributed to all households
64	1				
65		1		Find it very complicated. A single sheet would be good	A mini guide was produced and distributed to all households
66		1		Too complicated. Single sheet with bullet points and able to pick those approved	A mini guide was produced and distributed to all households

67	1			Basically good idea but too complicated. Needs to simplify	A mini guide was produced and distributed to all households.
68		1		Too complicated. Simply too long	A mini guide was produced and distributed to all households

Stroud District Council

TABLE 1		
NDP Section or Policy	Comment	Recommendation
P19, Policy SCE1	The reasoning and evidence base behind this policy is clear, however the actual policy wording doesn't add anything beyond what is already stated in Delivery Policy ES4 of the adopted Local Plan and the emerging policy ES4 in the Local Plan review. The focus should perhaps be on the identified local issues as identified in fig 3b	The policy text can be simplified, removing repetition from local plan policy, and instead stating support for development that addresses specific local flooding issues.
P21, Policy SCE2	Development affecting Heritage and Landscape is covered later in the NDP so, for clarity, the second paragraph of this policy could be replaced with "where they are in conformity with Landscape and Heritage policies within this plan". It is generally a given that development proposals need to be in conformity with other policies, however this helps give the emphasis to the potential impact of retrofitting to existing buildings.	See comment
P26, Policy SCE3	This policy doesn't add anything beyond the requirements set out in Policy ES6 of the adopted and emerging Local Plans. The evidence base is however strong, and	See comment.

	there is perhaps an opportunity for a simplified policy focussing on support for local ecological enhancements.	
P27 Policy SCE4	This policy seems to imply that the allotments and remaining orchards play a key role in supplying food within the neighbourhood area. Although both are worthy of inclusion in planning policy, there is no supporting evidence to suggest that their role in local food production is the framework to hang this policy from. There are 2 separate issues being addressed in this policy. Firstly, the provision of allotments. A separate policy on preserving and enhancing the provision of allotments in the neighbourhood area would be better suited for inclusion within the "Community Facilities" section of the plan. Secondly, the local orchards referred to are an historic landscape feature, and as such would be better afforded to a policy within the landscape and heritage section of the plan. Reference to local food production can still be referred to in supporting text, however as mentioned, it is felt that this does not in itself provide a robust framework for the aims of this policy.	Revise into 2 separate policies addressing allotments and orchards separately.
P30 Policy SCE5	This policy doesn't add anything beyond the requirements of Policy ES8 of the adopted and emerging Local Plans and national policy and guidance on trees and	Revise to provide a local focus on locally valued trees and hedgerows

	<p>construction, however it has a strong evidence base and identifies trees of local value. Adopted policy ES8 refers to the protection of trees “considered to be worthy” and emerging policy ES8 refers to “locally valued” trees. The evidence base therefore has the potential to enhance this policy to a locally relevant scale.</p>	
P32 Policy SCE6	<p>The first 2 bullet points of this policy could be replaced with “...where they comply with other policies within the NDP”.</p>	See comment.
P33 Strategic Development in Slimbridge Parish and Draft Priority Statement: Strategic Development in Slimbridge Parish	<p>It is unclear what this section brings to the NDP. Once adopted, the NDP policies will apply to ALL development within the Neighbourhood Area, whether that be a strategic development on smaller windfall site. This point does not need to be made in its own section of the NDP.</p> <p>The 2nd paragraph of the Priority Statement requiring demonstration of how development positively contributes towards the Vision and Objectives does not comply with local and national policy. The Vision and Objectives inform the policies within the NDP, and it is these policies, once adopted, that need compliance.</p> <p>The final paragraph also refers to a policy, which by definition must be complied with when adopted, and reference to its requirement here is unnecessary.</p>	See comment

	P35, Policy SD1	No comments	
	P36, Policy SD2	No comments	
	P38, Policy SD3	As mentioned, any development will be required to comply with local policies and other policies within the NDP, it is therefore unnecessary to list conditions under which affordable housing will be supported.	Simplify the policy by replacing the bullet points after the word “development” with “.. complies with other policies within the NDP”.
4	P42, Policy SLW1	The wording of this policy could be simplified to focus on the two main local issues i.e. protection of identified community facilities, and provision of those facilities deemed lacking. Although these issues are currently touched on they are lost slightly amongst the policy text. As mentioned, there is no need to reference other adopted policy or repeat wording from the local plan.	Review wording.
4	P44, Policy SLW2	No comments	
4	P46, Policy SLW3	This policy is fine, however there is perhaps an opportunity to incorporate specific local detail	See comment.
4	P47, Policy SLW4	No comments	
4	P49 Policy SLW5	Remove reference to Local Plan policy E110.	See comment.
	P56, Policy SLH1	The two-tier system of “key” and “valued views isn’t clear despite the explanation in the Locally Valued Key views report. It mentions that “valued” views will be protected to a lesser extent, yet there is no	See comment

		distinction in the policy wording which uses the blanket term “Locally Valued Key Views”. It is accepted that the value of views can be subjective, but they are either worthy of protection in planning policy, or they are not. The extent of the significance placed on each of the views can be determined by the description of the views in the report which will inform any planning decisions should views be affected by development.	
	P57, Policy SLH2	Remove the first paragraph of the policy as there is no need to refer to Local Plan policy.	See comment
	P61, Policy SLH3	The second paragraph and bullet points are unnecessary and repeat policy wording from ES10 of the adopted and emerging Local Plan. Please also check the asset list with an SDC Heritage Officer as the list will need to be ratified by SDC for the assets to be afforded the protection laid out by Policy ES10.	See comment



20 February 2023

Our ref: Gloucestershire 7

Dear Sir/Madam,

Slimbridge Parish Neighbourhood Development Plan 2022-2040 Regulation 14 Consultation Draft

Thank you for the opportunity to comment on your consultation, we have some specific comments to make on your plan. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments on the impacts of future developments and to provide advice regarding policy wording on other relevant areas such as water efficiency, Sustainable Drainage Systems (SuDS), biodiversity, and blue green infrastructure. Where more detail is provided on site allocations, we will provide specific comments on the suitability of the site with respect to the water and sewerage network. In the instances where there may be a concern over the capacity of the network, we may look to undertake modelling to better understand the potential risk. For most developments there is unlikely to be an issue

connecting. However, where an issue is identified, we will look to discuss in further detail with the Local Planning Authority. Where there is sufficient confidence that a development will go ahead, we will look to complete any necessary improvements to provide additional capacity.

Section 5A Addressing the Climate Emergency in Slimbridge Parish

Severn Trent is supportive of the supportive text included in section 5A.17 relating to the inclusion of SuDS and management of surface water in line with the drainage hierarchy. This is important for reducing the risk of flooding from the sewer network by reducing inflows of surface water into the network.

NOTED

Draft Policy SCE1: Natural Flood Management in Slimbridge Parish

We are supportive of this policy to sustainably manage surface water in the catchment.

NOTED

Draft Policy SD1: Locally Distinctive, High Quality Design

We are supportive of this policy, however it is missing reference to Water Efficient design. We are supportive of the use of water efficient design of new developments fittings and appliances and encourage the optional higher water efficiency target of 110 litres per person per day within part G

of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We would therefore recommend that the following wording is included for the optional higher water efficiency standard:

New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.

Action taken – add to Policy SD1

ADD to Policy SD1

Draft Policy SLW2: Local Green Spaces

We are supportive of this policy, however recommend that you include the following additional wording:

Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.

Action taken – add to Policy SLW2

ADD to Policy SLW2

For your information we have set out some general guidelines and relevant policy wording that may be useful to you.

Wastewater Strategy

We have a duty to provide capacity for new development in the sewerage network and at our Wastewater Treatment Works (WwTW) and to ensure that we protect the environment. On a company level we are producing a Drainage and Wastewater Management Plan covering the next 25 years, which assesses the future pressures on our catchments including the impacts of climate change, new development growth and

impermeable area creep. This plan will support future investment in our wastewater infrastructure and encourages collaborative working with other Risk Management Authorities to best manage current and future risks.

Where site allocations are available, we can provide a high-level assessment of the impact on the existing network. Where issues are identified, we will look to undertake hydraulic sewer modelling to better understand the risk and where there is sufficient confidence that a development will be built, we will look to undertake an improvement scheme to provide capacity.

Surface Water

Management of surface water is an important feature of new development as the increased coverage of impermeable area on a site can increase the rainwater flowing off the site. The introduction of these flows to the public sewerage system can increase the risk of flooding for existing residents. It is therefore vital that surface water flows are managed sustainably, avoiding connections into the foul or combined sewerage system and where possible directed back into the natural water systems. We recommend that the following policy wording is included in your plan to ensure that surface water discharges are connected in accordance with the drainage hierarchy:

Drainage Hierarchy Policy

New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.

Supporting Text:

Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states:

“Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.”

Sustainable Drainage Systems (SuDS)

Sustainable Drainage Systems (SuDS) represent the most effective way of managing surface water flows whilst being adaptable to the impact of climate change and providing wider benefits around water quality, biodiversity, and amenity. We therefore recommend that the following policy wording is included within your plan regarding SuDS:

Sustainable Drainage Systems (SuDS) Policy

All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate.

All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity.

Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.

Supporting Text:

Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.

Action taken – Noted and SuDS covered in SDC Local Plan

Blue Green Infrastructure

We are supportive of the principles of blue green infrastructure and plans that aim to improve biodiversity across our area. Looking after water means looking after nature and the environment too. As a water company we have launched a Great Big Nature Boost Campaign which aims to revive 12,000 acres of land, plant 1.3 million trees and restore 2,000km of rivers across our region by 2027.

We also have ambitious plans to revive peat bogs and moorland, to plant wildflower meadows working with the RSPB, National Trust, Moors for the Future Partnership, the Rivers Trust, National Forest and regional Wildlife Trusts and conservation groups.

We want to encourage new development to continue this theme, enhancing biodiversity and ecology links through new development so there is appropriate space for water. To enable planning policy to support the principles of blue green Infrastructure, biodiversity and protecting local green open spaces we recommend the inclusion of the following policies:

Blue and Green Infrastructure Policy

Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm.

Supporting Text:

The incorporation of Sustainable Drainage Systems (SuDS) into blue green corridors can help to improve biodiversity, assisting with the wider benefits of utilising SuDS. National Planning Policy Framework (2018) paragraph 170 States:

“Planning Policies and Decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”

Green Open Spaces Policy

Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.

Action taken – see above

Supporting Text:

We understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space through biodiversity and amenity benefits.

Water Quality and Resources

Good quality watercourses and groundwater is vital for the provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that the water quality of our supplies are not impacted by our operations or those of others. Any new developments need to ensure that the Environment Agency's Source Protection Zones (SPZ) and Safe Guarding Zone policies which have been adopted by Natural Resources Wales are adhered to. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan as prepared by the Environment Agency.

Every five years we produce a Water Resources Management Plan (WRMP) which focuses on how we plan to ensure there is sufficient supply of water to meet the needs of our customers whilst protecting our environment over the next 25 years. We use housing target data from Local Planning Authorities to plan according to the projected growth rates. New development results in the need for an increase in the amount of water that needs to be supplied across our region. We are committed to doing the right thing and finding new sustainable sources of water, along with removing unsustainable abstractions, reducing leakage from the network and encouraging the uptake of water meters to promote a change in water usage to reduce demand.

New developments have a role to play in protecting water resources, we encourage you to include the following policies:

Protection of Water Resources Policy

New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology. Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.

Action taken – Noted

Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 163 states:

“Planning policies and decisions should contribute to and enhance the natural and local environment... e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should wherever possible, help to improve local environmental conditions such as river basin management plans;”

Water Efficiency Policy

We are supportive of the use of water efficient design of new developments fittings and appliances and encourage the optional higher water efficiency target of 110 litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We would therefore recommend that the following wording is included for the optional higher water efficiency standard:

New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is

Action taken – see above

calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.

Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 149 states:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”

This need for lower water consumption standards for new developments is supported by Government. In December 2018, the Government stated the need to a reduction in Per Capita Consumption (PCC) and issued a call for evidence on future PCC targets in January 2019, with an intention of setting a long term national target. The National Infrastructure Commission (NIC) has already presented a report including recommendations for an average PCC of 118 l/p/d. In Wales, the 110 l/p/d design standard was made mandatory in November 2018. In 2021 the Environment Agency classed the Severn Trent region as Seriously Water Stressed – [link](#).

We recommend that all new developments consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres per minute or less.
- Water butts for external use in properties with gardens.

Water Supply

For the majority of new developments, we do not anticipate issues connecting new development, particularly within urban areas of our water supply network. When specific detail of planned development location and sizes are available a site-specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts. If significant development in rural areas is planned, this is more likely to have an impact and require network reinforcements to accommodate greater demands.

Developer Enquiries

When there is more detail available on site-specific developments, we encourage developers to get in contact with Severn Trent at an early stage in planning to ensure that there is sufficient time for a development site to be assessed and if network reinforcements are required that there is time to develop an appropriate scheme to address the issues.