

Green Party Response to the Stroud District Local Plan Review – Emerging Strategy

January 2019

Executive Summary

Stroud District Green Party broadly welcomes the overall thrust of the emerging plan and commends the council for the process, evidence base and transparency with which it is conducting this review.

We recognise that democratic input into the plan making process is highly constricted by the National Planning Policy Framework (NPPF), in which central government has concentrated decision making centrally, and left local communities and local government with insufficient powers to develop and protect their local environment. We strongly object to this, but recognise that this plan needs to be compatible with the NPPF.

The current consultation was launched in advance of the District Council declaring a climate emergency and committing itself, alongside other progressive local authorities, to reaching carbon neutrality by 2030. Attaining carbon neutrality by 2030 will have challenging implications for our revised local plan. It will require setting aside sites and policies to encourage significant additional renewable energy generation, including in appropriate locations within the AONB. New houses will need to be future proof and carbon zero, which will also reduce future energy bills and boost our local skills base in low carbon building. Reducing travel and modal shifts in transport will be important, transport needs to have an inbuilt hierarchy, which prioritises those modes of transport with the least greenhouse gas emissions (walking, cycling, buses and trains, as well as enabling the growth of electric vehicles and upcoming new transport technologies). Additional high quality agricultural land will need to be retained for human food production and other land for carbon sequestration.

If well planned all these changes can make our district a cheaper, safer, more attractive, more communal, more biodiverse and resilient place to live.

The Green Party objects to the Tory Government imposed demand that land is allocated for 12,800 additional homes by 2031. We believe this figure has been calculated using a flawed methodology and is undeliverable without significant damage to our environment and communities. We believe that if land is allocated within Stroud District to meet the housing needs of Gloucester City, then this number should be deducted from, rather than additional to, the numbers being forced upon Stroud District Council.

The Council needs more powers to force developers to build on brownfield sites and smaller, affordable homes. We are aware that the greatest need is and will be for both young people and young families as well as an increasing elderly population.

Introduction

In a major report published in October 2018, the Intergovernmental Panel on Climate Change (IPCC), the UN's climate science body, found limiting warming to 1.5C, compared to 2C, would spare a vast sweep of people and life on earth from devastating impacts.

To hold warming to this limit, the scientists said unequivocally that carbon pollution must fall to 'net zero' in around three decades, with "the next few years probably being the most important in our history," (Debra Roberts, co-chair of the Intergovernmental Panel on Climate Change (IPCC)).

A Climate Emergency was announced by the Stroud District Council Administration on 16 November, 2018 which pledged to "do everything within the Council's power to make Stroud District carbon neutral by 2030."

This means that the Local Plan must reflect this urgency and offer real alternatives for everybody to reduce their greenhouse gas emissions.

The Emerging Growth Strategy

(page 32, Emerging Strategy Paper)

We support the development of a sustainable 'garden-village' at Sharpness as long as the ecological aspirations are enshrined in the conditions to make them a reality. This does mean guarantees on sustainable transport links to Cam Station and Berkely Technical College and design to minimise impact on the biodiversity of the Severn Estuary. Development at Sharpness should be significantly large within the existing constraints, to maximise the infrastructure gains (especially transport links) that one large site can attract. Sharpness would be a very attractive site for house buyers due to its scenic position on the banks of the Severn, so should be highly deliverable.

An alternative strategy approach is proposed in response to question 4.2b, page 36 of the Emerging Strategy Paper, as follows:

The proposed Wisloe housing site should not be included in the revised Local Plan. The Natural England Agricultural Land Classification Map South West Region (ALC006) shows the land around Wisloe as being Grade 2 (Very Good), of which there is very little in Stroud District. Development should be avoided on such high-quality agricultural land, and such a high agricultural quality grading should reduce the sustainability rating of any proposed development on such land.

In addition, with limited local facilities, the site has poor transport sustainability compared to sites closer to urban areas, or sites like Sharpness with sufficient size and a clear plan to develop services locally.

Further, the identified land in the north of the district to the south of Gloucester currently allocated for use by Gloucester for its future housing needs, under the Joint Core Strategy, should instead be allocated in the revised Local Plan for Stroud District housing needs in view of the greatly increased housing needs numbers now being imposed on the District and the difficulty of identifying other such sustainable sites elsewhere in the District.

Housing policies to boost community resilience/social sustainability in towns and villages

Increasing numbers of residential units within and on the edges of existing settlements, both large and small, is essential to help ensure resilient communities and social sustainability into the future.

It is also important as a counter-balance to large concentration sites separate from the existing settlements, to ensure that the housing needs of local people, especially younger people, are met in and close to the places where they were brought up and have support networks, as opposed to local people being forced further and further away from the existing settlements into new peripheral commuter estates.

Brownfield sites should continue to be prioritised for development, but suitable sites of low landscape and biodiversity value on the edges of settlements should also be actively sought and considered, while continuing to protect those of high landscape and biodiversity value.

In particular, the proposal in The Emerging Growth Strategy (page 32, Emerging Strategy Paper) to allow limited development on sites of low landscape and biodiversity value on the edges of the smallest settlements (should the relevant parish councils support it in the interests of social sustainability) must be taken forward into the revised Local Plan.

Increasing numbers and densities of housing units within existing settlements should be prioritised and imaginative ways to achieve that should be actively sought and encouraged, including:

- Supporting conversion of excess town centre retail premises to residential where appropriate within secondary shopping frontages as town centre retail shrinks (requiring a more flexible updating of Delivery Policy E18, page 136 in the adopted Stroud District Local Plan, to take account of ongoing and future changes in bricks and mortar retail);
- Encouraging development upwards above existing building rooflines where possible and visually acceptable; and
- Actively investigating and pursuing the possibility of residential developments above existing car parks, which are currently an under-utilisation of valuable land within settlements which could serve a dual role as car parks with residential above.

There are currently discussions underway between landowners, including SDC, regarding redevelopment of the Police Station and surrounding sites in Stroud, to include potential new residential. This should be encouraged by SDC and could present an ideal opportunity to investigate the feasibility of residential development over the Church Street car park, as a first step in moving towards making better use of land currently given over purely to car parking.

Resilient Communities

The Local Plan needs to establish planning guidelines to require that schemes must consider and demonstrate “resilience” in order to be approved.

Planning Policy needs to enable communities to be able to develop organically, so that they can adapt to any foreseeable change and have flexibility to cope with shocks.

Communities may be exposed to shocks and stresses such as:

- Ageing
- Economic downturn
- Monetary collapse
- Loss of resources: food, energy
- Social disruption
- Transport disruption
- Health epidemics

- Extreme weather conditions.
- Technology change

Planning policy can reduce exposure to external shocks by:

1. encouraging multiple distributed resources rather than a large centralised system. For example, several small local food suppliers provide more resilience than one large supermarket that could be closed in any number of circumstances.
2. Insisting upon energy efficient homes which not only reduce energy requirements, lowering the stress on energy supplies and increasing the options for local energy generation, but also provide protection should energy supplies fail completely.
3. Encouraging and supporting Neighbourhood Plans and Community and Parish Plans so that the particular needs of individual communities can be identified and residents encouraged to engage democratically at the local level.

How can the Local Plan encourage/contribute to resilience?

Resilient Communities as the theme seems to traverse the following Strategic objectives in the Local Plan:-

- A. Homes and communities:
 - a. Accessible communities
 - b. Healthy, inclusive and safe communities
- B. Economy and infrastructure:
 - a. Local economy and jobs
 - b. Town centres and rural hinterlands
 - c. Transport and travel

Suggested Changes to Adopted Local Plan

(all page numbers refer to the adopted version of the Local Plan unless otherwise specified)

p. 9 Key Issues

Climate change and resilience are key issues faced by every community and need to be included here. We would like to see an additional key issue on the need to mitigate and adapt to climate change and the need to increase the resilience of communities by:

1. Energy efficient homes
2. Local facilities, reducing the need to travel and increasing social interaction and hence capital
3. Food growing facilities such as allotments
4. A variety of local employment to reduce dependence on one or two large employers and reducing the need to travel
5. Lively market town centres providing facilities for local people and opportunities for people to meet and interact, improving quality of life and social capital.
6. Sustainable transport routes providing alternatives to the private car.
7. A variety of housing types and tenures to enable balanced local communities.

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Local Economy and Jobs

p.125/6 Delivery Policy CP11 is generally welcome, however,

Concentration of employment leads to a problem of in-commuting. If industry is to be concentrated, then sustainable transport options must be provided and encouraged in line with CP11.

Add to point 2 of CP11: 'Increasing the capacity of the road network should not be considered until all possible sustainable transport options are in place.'

Add to end of first paragraph of CP11: 'Smaller work places such as small workshops employing fewer than 10 people and facilities for hot desking should be provided near to where people live.'

Tourism

We note the intention expressed on p. 9 of the preferred strategy paper, for a 'more flexible approach to tourism'. We have concerns over the meaning of 'a more flexible approach'.

Whilst there is an argument for increasing tourism, tourism tends to provide low paid seasonal employment and also tends to cause increased traffic. However, there is potential for sustainable (or relatively sustainable) tourism around the Cotswold Way, with Stonehouse, Dursley and Wotton providing ideal stopping off points and the planned re-opening of the canal.

p.126 Town Centres

Generally support the Preferred Strategy approach to Town Centres and suggest the following changes to the Local Plan.

add to 5.16: 'The pandemic of town centre decline is well known and so are the causes. It is probable that unchanging independent retail shops will continue to fail in town centres, possibly being replaced by outlets offering local community services and facilities. Change is inevitable and plans must be made to manage this change.'

Add new 5.17 and renumber: 'Town Centres are the main commercial or business areas of each settlement, containing the principal shops, banks, restaurants and public traffic hub.'

It is imperative that, in conjunction with the development of community plans, basic footfall and 'reason for visit' data is collected in a simple and regular fashion. Once a simple methodology is agreed and established it must be 'set in stone' for the duration of the plan.'

'This heartbeat data will provide the underlying measure of the health of the settlement and will provide a method to identify the success or failure of initiatives, interventions and actions during the duration of the plan.'

'Depending on the depth of the chosen methodology, any member of the public, community initiative or small business will be able to interrogate the data to identify needs and more importantly used as a basis for community proposals.'

Response to Emerging Strategy

We generally agree with the document but there are additional points that need to be considered:

1. One factor preventing start-up of new town centre businesses is the need to take out long-term rental contracts. Can Councils (District or Town) take over a small number of premises to be leased out at reasonable rents on short-term contracts to new businesses or to social initiatives such as Share and Repair? This isn't a planning issue but could be mentioned in the plan.
2. The matter of whether primary and secondary shopping frontages need adjustment needs to be considered on a town by town basis depending upon factors such as the number of shops that have remained empty for a significant period of time.
3. Sometimes a town centre can be helped by, or a community facility can be provided by, development outside the development boundary. A reinterpretation of enabling development may be needed so that development that can be shown to contribute to the resilience of a community would be allowed outside the boundary.
4. New development should be situated where it can positively contribute to resilience eg within walking distance of town centres where possible.
5. Linking with our transport response, sustainable transport routes to town centres from their catchment area must be developed and promoted.
6. Public space, both indoor and out, where people can meet and interact is important for developing social capital and hence resilience as well as to improve quality of life. It needs to be protected and enhanced.
7. We welcome the commitment to support for existing markets and sites and/or policies which support further markets. (Emerging Strategy, p.14)
8. We welcome the reference to Neighbourhood Plans. More of these plans (and less formal community plans) need to be encouraged and communities should be supported to produce them.
9. Whilst there may be a role for town centre managers there needs to be the flexibility to meet the needs of each community differently such as through a revolving fund to finance initiatives that have local support, encouraging each town to develop in its own way and establish a unique selling point.
10. Chambers of Trade and Commerce need to be encouraged and supported so that they can lead and support this development.

Lifelong homes – age friendly communities

In the 2015 plan there is little to disagree with in any of the core policy statements. However, the concept of self-support and design that encourages community engagement within the developments is not covered.

A real problem is how to include the idea of mixed arrangements of accommodation to suit differing lifelong requirements with conventional property ownership; flexible lease/rental arrangements would appear to offer more options in this regard over and above social housing. This is an issue which if resolved might enable more development flexibility. Perhaps an option is partnering with local housing associations (or establishing new ones) for developments of even moderate scale (say 20+ units).

Here are some specific suggestions:

Within scope of NPPF, page 5 Achieving sustainable development and from the Stroud 2015 local plan, Page 105

4.5 ...and help to encourage social cohesion (add) **by ensuring easy regular contact of all members with the provision of accessible age and family friendly spaces.**

4.9 In implementing this policy, the Council will consider viability and deliverability aspects in accordance with national advice, (add) **but this will not permit developments to ignore these considerations¹.**

CP7 (add) **5. Inclusion by the prevention of isolation within the development.**

(add) **4.13b Good design is essential to ensure the development contributes towards an inclusive and supportive community, building solutions and not future problems.**

CP8 (add) **3b Have a layout that encourages regular contact with all members to reduce social isolation.**

Increasing Renewable Energy Generation

The Council should in accordance with Paragraph 151 of the NPPF (2018) develop suitable policies to increase the use and supply of renewable energy and the allocation of suitable areas of land within the District for renewable energy including onshore wind and large field-scale solar developments;

151. To help increase the use and supply of renewable and low carbon energy and heat, plans should:

a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);

b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and

c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for collocating potential heat customers and suppliers.

The Local Plan needs to be developed through actively working with Western Power Distribution to ensure there will be grid capacity for new renewable energy generation for all new housing and business developments, as well as suitable areas for renewable energy generation.

The Local Plan Review also needs to:

- a. Introduce appropriate policy guidance to encourage the installation of PV panels (combined with battery storage) on existing housing including listed buildings and in conservation areas;

¹ This is essential. Because if developers are able to argue that economic viability trumps all other consideration we will only build problems, not solutions. This appears to be supported from NPPF p7, 14 " the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits"

- b. Introduce appropriate policy guidance to encourage the installation of PV panels (combined with battery storage) on commercial buildings throughout the District including those within the AONB;
- c. Introduce development of appropriate policies to encourage the development of new hydro power schemes through the District;
- d. Provide suitable guidance for the development of Neighbourhood Plans that actively support new renewable energy developments
- e. Introduce development of appropriate policies to encourage new small and medium scale tidal power schemes within the District

Green Infrastructure

Networks of Green Infrastructure through new developments improve the quality of life of residents as well as allowing the passage of wildlife. It is important that new developments are looked at from the beginning in the context of existing green and blue infrastructure networks and are used to improve those networks by providing missing links. Rather than being added extras, green networks need to be planned into new developments from the beginning before other factors such as road networks are fixed.

The impending climate emergency makes it imperative that wildlife can migrate as the climate changes. Bearing in mind that wildlife travels at different levels and by different means (eg at ground level, from tree to tree or via waterways, this necessitates unbroken networks including means for wildlife to cross barriers such as busy roads.

Green infrastructure can also help combat climate change by contributing to carbon absorption.

Green infrastructure improves quality of life by facilitating walking and cycling and providing access to the surrounding countryside.

Suggested changes to the Local Plan to reflect the urgency of addressing climate change issues:

Key Issues

(all page numbers refer to the adopted version of the Local Plan unless otherwise specified)

P.13 needs strengthened reference to climate change, referring to an increased need for green corridors to allow wildlife to migrate and to green corridors and green spaces as a mechanism for carbon absorption.

p. 17: Vision for the future, also needs to refer to climate change

p.18: Strategic Objectives: SO5: support but would like a further bullet point on carbon absorption:

‘Promote networks of green infrastructure as a mechanism for carbon absorption’

p. 32: Core Policy CP4: Place Making

in point 3, insert ‘for people and wildlife’ after ‘permeability’

p.106: Core Policy CP8:

Insert bullet point 2 and renumber:

‘2. Be based around a network of existing and new green infrastructure conforming at a minimum to the core standards set down by Building with Nature (<https://www.buildingwithnature.org.uk/>).

Developers are encouraged to apply for a Building with Nature Award. In addition, developments will be designed to allow the passage of small animals such as hedgehogs between gardens.'

Add to point 4.13, 'Stroud District council will work with Gloucestershire Wildlife Trust to develop a detailed GIS planning tool showing green corridors, including hedgerows, and green sites'. This tool will be made available to developers who will be expected to use it when planning developments.'

p. 125/6 CP11: New Employment Development

Amend point 3 to include the need to include a network of green Infrastructure. As it stands it allows industrial estates in areas with no green infrastructure at present to perpetuate that design.

Insert after 'facilities', 'that include a network of green Infrastructure for people and wildlife'.

p.151/152: CP14 High Quality Sustainable Development

Insert additional point: 'a network of Green Infrastructure conforming at a minimum to the core standards set down by Building with Nature

Insert at the end of penultimate paragraph after 'need' 'or where that need is likely to arise from the development'.

p. 171 Delivery Policy ES14:

Amend first paragraph as follows: After 'Strategic and Major Residential Development' insert 'shall be designed around a Network of Green Infrastructure, building on and adding to pre-existing sites and corridors, for wildlife and people and'.

Insert references to ES14 as contributing to:

SO1: p.104 and SO5: p.147

Paragraph 6.69 in the local plan should have a reference to the **Green Infrastructure, Sport and Recreation Study** that is in the process of being written.

Appendix 1

p.184: Insert an additional indicator for ES14. 'Number of developments achieving Building with Nature' awards.

Agriculture

The NPPF states that local plans should:

- promote the development and diversification of agricultural and other land based rural businesses. (para 83);
- recognise 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 (para 170).

Note: the NPPF defines **Best and most versatile agricultural land** as *Land in grades 1, 2 and 3a of the Agricultural Land Classification*.

We support:

ESp5 Prioritising building on brownfield and infill sites, rather than greenfield and agricultural land;

ESp6 efforts to make improvements to public transport and cycle routes in rural as well as urban centres and support agriculture, farm diversification and smaller local businesses;

ESp84 retention and renewal of traditional orchards; encouraging active management of woodland for bio-diversity & strengthening of green infrastructure at ground and canopy level;

ESp87 support for “farmers markets” to reduce food miles – and not just in Wotton.

Land in grades 1, 2 and 3a of the Agricultural Land Classification should be presumed to be reserved for food production. Change of use to Equestrian or other non-productive uses should be resisted and where change of use is not applied for, enforcement action taken.

Agricultural land used for renewable energy generation should be returned to agricultural use when the renewable energy use ceases; it shall not be regarded as brownfield land.

Green infrastructure at both ground (e.g. hedges) and canopy level (in woodland) shall be encouraged to extend through rural and agricultural areas to provide habitat continuity and encourage bio-diversity. As a general principle, clear felling of woodland will not be permitted if it will interrupt green infrastructure route continuity at canopy level.

Transport

How to provide extra housing and employment without increasing motor traffic and consequently congestion and carbon dioxide emissions:

The Department for Transport’s (DfT’s) Road Transport Forecasts predict that road conditions will be more congested by 2035 compared to 2010 with congestion expected to worsen on all road types. This is when journey times become unpredictable.²

p.9: Key Issues

The Local Plan must reflect the urgency of the climate emergency and offer real alternatives for everybody to reduce their greenhouse gas emissions. In this light, the Local Plan needs to prioritise those modes of transport with the least greenhouse gas emissions (such as walking, cycling, buses and trains as well as upcoming new transport technologies), whilst the improvement or creation of road infrastructure that would lead to a further increase in road transport has to be the last resort.

Real alternatives to private car transport and an increase in road network infrastructure need to be in place in order to enable a noticeable decrease in private, single user car journeys, thereby enhancing everybody’s quality of life and reducing our carbon emissions by 2031.

This needs to be reflected by setting budgets for the more sustainable modes of transport prior to budgets used for road improvement and development. The Local Transport Plan states that there is no money for any new road schemes and that it will be a challenge to maintain the existing network. The LTP’s four principles (a greener, healthier Gloucestershire, sustainable economic growth, a safer, securer transport system, good access to services) aspire to a more sustainable transport system; this needs to be reflected in practice.

How to provide extra housing and employment without increasing motor traffic and consequently congestion and carbon dioxide emissions:

² Gloucestershire Local Transport Plan, Policy Document PD4-Highways: nationally, by 2035, 24% of all traffic will be travelling in very congested conditions in urban areas (compared to a 2010 baseline of 13%),

Somewhere in the Foreword or in Key Issues or in the Infrastructure and Economy section we need to acknowledge the climate emergency and that we have 12 years to turn around climate change and that for this reason there is an urgency to prioritise sustainable modes of transport before improving or building new infrastructure (in the form of roads). We also need to mention that transport forecasts predict more congestion and unpredictable travel times. Policy Document 4 Highways LTP quotes DfT's Road Transport forecast as 24% of all traffic travelling in very congested conditions in urban areas by 2035, with congestion expected to worsen on all other road types with journey times becoming unpredictable. (Para 2.25 in Policy Document 4) and that the Local Transport Plan states that there is no money for any new road schemes and it will be a challenge to maintain the existing network. The LTP's four principles (a greener, healthier Gloucestershire; sustainable economic growth; a safer, securer transport system; good access to services) could all be interpreted to be about a more sustainable transport system, so the more we can build references into the Local Plan, the better.

p. 20 SO4: Transport and Travel;

support but add in 2.15 after 'communities' 'and enable the provision of safe direct and convenient cycling and walking routes to existing town centres and their associated services'

p.25 discusses the need to minimise out-commuting but there is also a problem with in-commuting to employment areas such as Stonehouse. Where employment is concentrated, sustainable transport options must be available and encouraged. The reference to re-opening Stonehouse Bristol Road Station should be strengthened.

p.106 CP8: New Housing Development

Reword point 2: Delete 'or' and replace with "and, where necessary" so that it reads:

Have a layout that supports accessibility by bus, bicycle and foot to shopping and employment opportunities, key services and community facilities and contributes towards provision of new sustainable transport infrastructure to serve the area.

p.126 CP11 New employment Development

replace point 2 with: 'Have a layout that supports accessibility by bus, bicycle and foot, provides secure covered cycle parking, recharging facilities for electric vehicles and contributes towards provision of new sustainable transport infrastructure to serve the area.'

p.129: CP13 Demand Management and Sustainable Travel Measures

The first mention of the Gloucestershire Local Transport Plan is in CP13 and E12. Given that any development will come with an increase in travel, any core policies pertaining to development need to refer either to CP13, E12 or the Local Transport Plan.

CP13 point 1: after 'allow' insert 'for and encourage'

CP13 point 2: should be changed from "Improve the existing infrastructure network, including rail and bus, facilities for pedestrians and cyclists, including provision for those with reduced mobility, and other users" to

“Improve the existing infrastructure network including road, but prioritising rail and bus, facilities for pedestrians and cyclists, including provision for those with reduced mobility, and other users”³

CP13 point ii: add at the end of point, ‘and provide secure covered cycle parking’

Core Policy CP13
Demand management and sustainable travel measures

Proposals for major schemes, as defined by the Town and Country Planning (Development Management procedure) (England) Order 2010, will be supported where they:

1. Provide for a variety of forms of transport as alternatives to the car to allow more sustainable choices
2. Improve the existing infrastructure network, including road, rail and bus, facilities for pedestrians and cyclists, including provision for those with reduced mobility, and other users
3. Mitigate any significant adverse affects upon the transport network that arise from the development proposed.

In all development cases, schemes shall:

- i) be located where there are, or will be, at the time of development, choices in the mode of transport available and which minimise the distance people need to travel
- ii) provide appropriate vehicular parking, having regard to car ownership and the Council's adopted standards
- iii) not be detrimental to and, where possible, enhance road safety and
- iv) not cause or contribute to significant highway problems or lead to traffic related environmental problems.

Development proposals shall be consistent with and contribute to the implementation of the agreed transport strategy, set out in the Gloucestershire Local Transport Plan. Any transport assessment needs will be consistent with the requirements set out in the Gloucestershire Local Transport Plan.

Delivery Policy E112 Promoting transport choice and accessibility needs prioritising over other transport modes such as road infrastructure, so that there is a hierarchy with sustainable transport modes first over improving roads (roads should be the last resort, not on a par with sustainable transport measures).

At the moment it reads as follows: "Where appropriate, new developments will be required to connect into the surrounding infrastructure, and contribute towards new or improved walking, cycling and rail facilities within the District and the provision of an integrated public transport network across the District."

Change to:

“Where appropriate, new developments will be required to connect into the surrounding infrastructure in the first instance to contribute towards new or improved walking, cycling and rail facilities within the District and the provision of an integrated public transport network across the District, and at last resort into existing infrastructure.”

³ (This would incorporate a recent standard suggested by NICE, National Institute for Health and Care Excellence)

p.141: E113:

Support but - Add an extra point to 5.69:

‘road networks need to be designed with cyclists and pedestrians in mind, minimising the use of facilities such as roundabouts and slip lanes.’

Delivery Policy E113 on Protecting and extending our cycle routes should consider GCC’s Cycle Facility Guidelines March 2012 and Gloucestershire Local Transport Plan PD2-Cycle.

Appendix 2 p.185

Local Plan is till 2040 so we suggest one charge point for each car parking space ⁴

- i) Could there be an encouragement to use permeable surfaces for car parking where possible rather than tarmac?

Under cycle parking:

Table C (p. 188) has a column heading ‘car parking’ which presumably should read ‘cycle parking’

A reference is required to the increase in electric bikes and the need for better undercover parking facilities (which only starts when 10 spaces are provided in the same location).

CP13 and delivery policies related to transport (E112-E116) should be referred to in other parts of the Local Plan. Suggestions are as follows:

Under ‘How are we going to get there- Policies designed to deliver SO1’ on page104 of the Local Plan needs to reference E16 Provision of public transport facilities so that people can access services via other means of transport than a private car.

Under ‘How are we going to get there- Policies designed to help deliver SO2’ on page 119 of the Local Plan refer to (ideally the updated version of) CP13.

Under ‘How are we going to get there- Policies designed to deliver SO3’ on page 122-124 of the Local Plan refer to (ideally the updated version of) CP13, E113 Protecting and extending our cycle routes, E114 Provision of rail stations and halts and E116 Provision of public transport facilities.

SO5 Climate change and environmental limits, page 18, change “Supporting a pattern of development that facilitates the use of sustainable modes” to:

“Supporting a pattern of development that prioritises the use of sustainable modes of transport”.

Housing Standards

In order to meet Stroud District Council’s aspiration to be Carbon Neutral by 2030 energy standards are needed; as yet national policies are not in place to achieve the 80% reduction by 2050 set in UK law.

Climate Change is already putting our present-day economy, property, health, food and environment at severe risk. Left unchecked it will lead to devastating and catastrophic impacts in all

⁴ (this is Simon’s suggestion, Paul suggested 4 chargers per 100, with a minimum of 1 for smaller car parks (2 cars))

these areas. Proper evaluation needs to include co-benefits on a National Scale and over a suitable timescale (e.g. Lifetime costing); this has been done by many.

Social responsibility and fairness have always been an important part of Stroud District Council's decisions. Future generations must not be treated as if they are substantially of less value than the present. Climate Change is essentially irreversible and the scale and duration of the effects is unprecedented. Delay in action is expensive and particularly damaging. Action reduces exposure of home owners to energy price volatility, reduces national reliance on foreign energy imports, improves thermal comfort and health, reduces infrastructure costs, reduces local air pollution and will create a significant number of local jobs.

Retrofit is complicated and expensive; building right the first time is much cheaper. Houses are investments that last much longer than any other. Even though the design life may be 60 years we know they last much longer. For example, Victorian houses are all around us and the UK has the oldest housing stock in Europe ([Europarl p4](#)). Demolition rates of 0.5% imply that current housing will typically last 200 years. We know that zero carbon housing will very soon be required. This long life of buildings leads to a lock-in effect: buildings predetermine the emissions over their foreseeable life until retrofits improve it. It would be a severe oversight to allow buildings to be built that will require expensive retrofit in order to be zero carbon within 10 years.

The IPCC Special Report gives four possible scenarios forward and all of which require emissions to be net zero by 2050 followed by negative emissions, i.e. Carbon Capture. Given the urgency and short timescale, we must build homes that are carbon neutral: they could also be low embodied Carbon and low cost. Building fabric lasts much longer than PV, so carbon neutrality should be achieved through building fabric.

Other councils are also using low energy standards. For example, Passivhaus has been adopted for 800 units in Norwich in 2018 (some at no extra cost, e.g. 105 units at [Goldsmiths Street](#), now nearing completion); London has ambitions to also be [Zero Carbon](#); Glasgow is putting forward Passivhaus as one of the recognised options of Nearly Zero Emissions ([Option 2](#)); and Scotland is expanding the able-to-pay market [euractiv](#).

Energy Standard for new housing:

- In ES1 replace “Maximising Energy Efficiency” with “Low Carbon Housing till 2022, Zero Carbon Ready Housing until 2024 and from 2025 Zero Carbon Housing”. The text describing those standards is given below.
- ES1 target in Appendix 1 to read “90% of new dwellings to meet Low Carbon Housing from 2020 to 2022, Zero Carbon Ready housing from 2022-2024 and Zero Carbon from 2025.
- CP8 target in Appendix 1 to read “10% of insulation for new houses to be from local recycled sources by 2025”.

CP8 p106 add: In order to meet CP8 and CP14 sustainable construction techniques a target of 10% of insulation to be met from locally recycled sources by 2025 has been set. Insulation will be made from polyethylene (PE) already widely used for pipe insulation, polyester which is derived from PET plastic bottles and shredded Expanded Polystyrene (EPS). This also has the advantage of diverting PE and EPS from landfill since both are currently not recycled.

The accompanying text below describes three phases to allow sufficient time for the local construction industry and local supply chains to adapt, for the years indicated, while ensuring all properties from 2020 are either Zero Carbon or easily retrofitted to Zero Carbon:

Phase 1. 2020 - 2022: Low Carbon Housing

During these three years local building standards must meet a *low carbon housing* (see Glossary in Appendix 3) Minimum Energy Efficiency standard of 40kWh/m².a. This is a modest improvement on current standards and is easily achievable. Certification for this standard will be required.

In order to meet “ES1(5) facilitation to be retrofitted” a future model of the house as a Zero Carbon House must have been completed and the following elements must meet that specification:

- exterior walls (including a low thermal bridge wall-floor junction)
- ground floors
- windows

These all should have a design life beyond 2050, some well beyond, and would constitute disproportionately expensive parts of a retrofit (e.g. for opaque elements typically U-values of 0.1 kWh/m².a.) while also reducing thermal bridging, 0.8 kWh/m².a for windows.

Phase 2. 2022 - 2024: ‘Zero Carbon Ready’ Housing

These are houses that only need PV or a small amount of wind turbine offsetting to be Zero Carbon; no retrofitting of any kind is needed for the house. Dwellings must achieve this through a Zero Carbon Ready Housing standard (see Glossary in Appendix 3) which sets a lower Minimum Energy Efficiency Standard of 15kWh/m².a and appropriate certification. Designers and builders must demonstrate competence in this field through qualification in recognised training or previous projects. Construction techniques must be tried and tested, low risk, have a long history, meet the intended energy target (i.e. have no Performance Gap), have been demonstrated within the UK and be achievable at little or no extra cost for the home owner.

Phase 3. 2024 and beyond: Zero Carbon Housing

In order to meet ES1 (1) Proposals must be Zero Carbon (see Glossary in Appendix 3), using the same fabric standard as above. Compliance must be assured without a *performance gap* (see Glossary in Appendix 3).

In order to meet CP14 (2), wood stoves and wood pellet boilers are not satisfactory solutions, they are a substantial source of air pollution and provide no improvement in thermal comfort for the owner.

[Add to Local Plan Appendix 3. Glossary](#)

Low Carbon Housing – a temporary stop gap solution with a fabric standard slightly better than current industry standards. Dwellings must achieve a Minimum Energy Efficiency Standard (MEES) of 40kWh/m².a and be capable of being upgraded to Zero Carbon without expensive retrofit. ES1 notes describe how this can be done. Certification in the UK is available through the Association of Environmentally Conscious Builders (AECB).

Minimum Energy Efficiency Standard (MEES) – This has been part of the definition of Zero Carbon for some time, e.g. by the Zero Carbon Hub. Essentially it sets how much a zero carbon building can

rely on renewables and how much from its own insulation. A high figure, e.g. 40kWh/m².a puts high reliance on renewables and therefore could create a problem when for example PV reaches the end of its useful life in 25-30 years. A low figure of 15kWh/m².a relies more on the fabric of the building, i.e. insulation which will last the life of the building.

Passive Solar Energy – replace this entry (there are no references in the document), this is an outdated method that gives rise to overheating problems, replace it with the entry below:

Passive House (Passivhaus) – buildings (not necessarily houses) that have around 1/10th the energy use of current buildings without a performance gap. See Zero Carbon Ready housing is defined as essentially this standard, which has been widely adopted in the UK, in Europe and worldwide. Extensive information is available at the Passivhaus Trust, a UK non-profit affiliate. SDC has already been in favour of adopting this standard. The UK has several training courses running each year and several certifiers of this standard.

Performance Gap – a common and serious problem throughout the construction industry in the UK is that dwellings typically perform far worse than their intended performance targets as measured with SAP, known as “the performance gap”. SAP is a low accuracy regulation tool, it is not intended to accurately model energy in use, however it is important that Zero Carbon houses do meet their performance. The gap can be overcome with certification such as Passivhaus Certification (available in the UK) which includes higher accuracy calculations and on-site compliance photographic record.

Zero Carbon Ready Housing - Dwellings must achieve a Minimum Energy Efficiency Standard (MEES) of 15kWh/m².a through fabric measures, have an airtightness of <0.6 air changes per hour at 50 Pascals and must not have predicted overheating (>25C) for more than 2% of the year using current climate data. Around 1000 properties already meet this standard in the UK with approximately another 1000 in progress (the Passive House (Passivhaus) Standard was originally developed 25 years ago). In order to meet this standard without a serious performance gap, higher accuracy calculations are needed which estimate the energy performance of the building in use. This is currently in addition to Part L SAP but may in the future be deemed to comply and replace Part L requirements.

Zero Carbon Housing – many definitions have existed; the differences revolve around what allowable solutions and offsite measures could be included to reduce the cost. SDC adopts a best practice solution that places the householder first, and minimises the quantity of renewables that need to be replaced at the end of their 20-30-year life in order for the dwelling to remain zero carbon. This is done by setting a relatively good fabric standard for the building, see ‘Zero carbon ready housing’ of 15kWh/m².a, which already has a large following in the UK, throughout Europe and is economic.