



COMMENTS ON STROUD DISTRICT DRAFT LOCAL PLAN

Consultation on the draft Local Plan is open until 22 January 2020. Comments can be submitted [via online surveys](#), by e-mail (local.plan@stroud.gov.uk) or by post (Local Plan Review, Planning Strategy Team, Stroud District Council, Ebley Mill, Stroud GL5 4UB).

Summary of comments

Overall, the draft Local Plan should be **welcomed and supported** because it seeks to address climate change as an 'over-arching priority' and includes, in particular, an associated strategic objective (SO5), a new Core Policy on delivering carbon neutrality by 2030 (DCP1), and associated Delivery Policies (ES1 and ES2).

We have a small number of additional comments relating to the need to:

- ensure consistency of wording about the commitment to achieve carbon neutrality by 2030
- ensure consistency between related policies, and
- achieve a stronger commitment to adaptation measures, a carbon neutral economy and carbon neutral agriculture.

Consistency about the commitment to achieve carbon neutrality by 2030

This commitment is clearly expressed at a number of key points in the draft Local Plan. In particular the Vision refers to "becoming neutral by 2030", and Core Policy DCP1 states "Stroud District will become carbon neutral by 2030". However, there are some points where the commitment is weaker, for example, the 'over-arching priority' and 'environmental issue 20' refer to "moving the District *towards becoming* carbon neutral by 2030" (emphasis added). We suggest that the stronger wording be used consistently throughout.

Consistency between policies

There are a number of points where drafting should be reviewed to ensure consistency between policies that address related topics. In particular:

- Core Policy CP5 (Environmental Development Principles for Strategic Sites) lacks any explicit reference to achieving carbon neutrality and refers only to minimising net greenhouse gas emissions amongst a range of objectives. In contrast, Delivery Policy ES1 (Sustainable construction and design) explicitly states that development proposals

should achieve net-zero carbon. We suggest that CP5 should contain a principle that reflects the strengthened ‘over-arching priority’ and the requirement in DPES1.

- Delivery Policy EI12 (Promoting transport choice and accessibility) rightly focuses on promoting modal transport shifts and the need to avoid encouraging private car use. It subsequently excludes any reference to EV charging infrastructure. In contrast, Delivery Policy ES1 (Sustainable construction and design) makes welcome reference to the need to enable EC charging. Given the need to accelerate a transition to EVs as a component part of addressing the ‘over-arching priority’, we would suggest that an appropriate way of promoting the development of the EV charging infrastructure also be found in DPEI12.
- Delivery Policy ES2 (Renewable of low carbon energy generation) states that renewable energy proposals within the AONB will be encouraged, but that the benefits must demonstrably outweigh any harm. In contrast, ES7 (Landscape character) states that in the Cotswolds AONB *priority* will be given to conservation and enhancement of natural and scenic beauty, and that major development will only be permitted if demonstrated to be in the national interest and with a lack of alternative sustainable development sites. We understand that Cotswold AONB strategy, guidelines and position statements are to be reviewed in the light of the climate emergency. In the meantime, we suggest that the drafting in ES7 be reviewed and amended so that it more closely reflects the draft Local Plan’s ‘over-arching priority’ and Delivery Policy DPES2.

A stronger commitment to adaptation measures

We note with concern the Climate Change Committee’s [recent assessment](#) of the UK’s approach to adaptation to climate change, as it concluded that the country is worryingly unprepared for the changes ahead. In its [recent letter to the new Prime Minister](#), the CCC highlighted that the “country is not prepared for even the minimum expected level of global warming, let alone the extreme changes predicted if international efforts to reduce emissions continue to stall”. In its letter, the CCC drew attention to the need to: reduce flood risk, manage the risk from extreme heat; reduce the risk of drought; and protect the natural environment.

Although welcoming the reference in the draft Local Plan’s ‘over-arching priority’ to adapting to climate change, and to elements of adaptation in Strategic Objective 5 and Core Policy 1, we suggest that the draft plan be reviewed to identify more detailed policies that encourage and enable more thoroughgoing adaptation to take place. In undertaking this review, we suggest that due regard be paid to the principles and good practice guidance in the TCPA/RTPI report [‘Rising to the Climate Crisis: A Guide for Local Authorities on Planning for Climate Change’](#) (sections 3.1 and 4.4).

A stronger commitment to transformation to a carbon-neutral economy

We note the statement in the Government’s Industrial Strategy White Paper that: “Whole new industries will be created and existing industries transformed as we move towards a low carbon, more resource-efficient economy” (p42). We welcome the strong emphasis in

the draft Gloucestershire Local Industrial Strategy (LIS) that the county should become the greenest place to live and work in England. In our view, this means that delivery of the LIS should prioritise practical initiatives that enable and support the transformation to a carbon neutral and circular economy. We also think that economic activities that contribute directly to achieving this transformation, or are consistent with it, should be encouraged and enabled, but those that jeopardise or undermine it, should be discouraged.

Although we welcome the references in the draft Local Plan to encouraging emerging opportunities within the 'green sector' and with 'green technologies' paras (2.57, 2.60), and to support for green technology hubs (p39), we suggest that the draft plan be reviewed to identify ways in which a more thoroughgoing approach to economic transformation can be encouraged and enabled. In particular, given the 'over-arching priority' in the draft Local Plan, we would expect proposed Strategic Objective (SO2) and Core Policy (CP11) to be drafted in ways that explicitly support transformation to a carbon neutral and circular economy. We also suggest the forthcoming Economic Needs Assessment (p36) address the required transformation as a matter of priority.

A stronger commitment to achieving carbon neutrality in agriculture

We welcome the commitment in Core Policy DCP1 that development must be designed to support local food production. Given the importance of agricultural practices to carbon sequestration and greenhouse gas emissions, we also suggest that the draft plan be reviewed to identify ways in which a more thoroughgoing approach to sequestration and emission reduction can be encouraged and enabled across the agricultural and horticultural sectors. In so doing, opportunities should also be taken to promote community-based food growing initiatives. As a specific example, we suggest that the diversification plans specified in Delivery Policy EI5 (Farm and forestry diversification) also be required to demonstrate that appropriate consideration has been given to the potential for sequestration, greenhouse gas emissions reduction and community-based initiatives.