

**From:** [REDACTED]  
**Sent:** 20 13:05  
**To:** \_WEB\_Local Plan  
**Subject:** FW: Stroud District Local Plan - CDC officer comments  
**Attachments:** Delivery Policy ES2 (CDC officer comments).docx

**Categories:** Consultation response

[Please register](#)

---

**From:** [REDACTED]  
**Sent:** [REDACTED]  
**To:** [REDACTED]  
**Su** trict Local Plan - CDC officer comments

**Dea** [REDACTED]

Please see below officers' informal comments to the draft Stroud District Local Plan.

Chapter 1 – Key Issues

Supportive of the 40 key issues many of which affect Cotswold District (e.g. climate change, protecting and enhancing special landscape areas, rural economy, health and wellbeing, etc.)

Chapter 2 – Making Places (the Development Strategy)

Support vision and CDC is likely to work with neighbouring partners to help it achieve carbon neutrality over the next two decades. Support recognition of special environment, social and economic qualities. Support strategic objectives. Development locations appear to be sustainable propositions and opportunities to benefit from a new heat network in the south Gloucester area has to the potential to support carbon zero ambitions. Support smaller scale development to meet local needs within AONB.

SDC is demonstrating a positive approach to delivering housing needs within the Severn Vale area and across the wider Gloucestershire housing market. Support approach to housing land supply and welcome additional headroom (just over 2,000 dwellings) over and above the housing requirement. This will help to mitigate fluctuations in the housing market. Clearly developer intentions and capacity to build at suggested build rates will be a key matter at submission and examination (table 6).

Town Centres – Welcome findings of the “Future of Town Centre report” many of the issues are relevant to Cotswold towns and larger villages. Officers welcome opportunities to share learning and work collaboratively to support our respective town centres.

Welcome the ambitious DCP1 policy (Delivering Carbon Neutral by 2030). Cotswold has also declared a climate emergency and given the cross cutting nature of the issue officers welcome the opportunity collaborate on the issue, where possible and practical.

Chapter 4 – Homes and Communities

General support for the core policies and appear consistent with NPPF/G requirements. Policy DHC2 – It is not clear how SDC has alighted on a maximum of “9” dwellings. CDC local plan policy DS3 employs the phrase “small scale”, this is proving useful and allows the DM process to consider the merits of the application. DHC4 –reads more like Reasoned Justification than policy. Welcome the planning for healthy communities policies – they provide useful examples for CDC when it updates its local plan.

NB: Publica has recently been awarded government funding to investigate how to deliver carbon neutral affordable homes, which may prove helpful to SDC.

## Delivery Policy ES2

### Renewable or low carbon energy generation

Decentralised renewable and low carbon energy schemes will be supported and encouraged, and will be approved where their impact is, or can be made, acceptable.

In determining applications for renewable and low carbon energy, and associated infrastructure, the following issues will be considered:

- a) the contribution of the proposals, in the light of the Council's pledge to be carbon neutral by 2030, to cutting greenhouse gas emissions and decarbonising our energy system.
- b) the impact of the scheme, together with any cumulative issues, on landscape character, visual amenity impact, water quality and flood risk, heritage significance, recreation, biodiversity and, where appropriate, agricultural land use, aviation and telecommunications.
- c) the impact on users and residents of the local area, including where relevant, shadow flicker, air quality, vibration and noise.
- d) the direct benefits to the area and local community.

Ground-mounted solar energy developments are more likely to be supported in areas identified as suitable in principle as set out on the Policies Map. Outside these areas, applicants will need to provide a clear justification for the suitability of the chosen development site for solar development at the relevant scale.

Proposals for R-renewable energy proposals within the AONB will be encouraged. H, however, where development proposals will affect the AONB, the benefits of development must demonstrably outweigh any harm adverse impacts to the designated area or its setting.

Additionally, proposals for wind energy development:

- should be located within a suitable area as indicated on the Policies Map;
- are more likely to be supported if they fall within Landscape Character Areas of lower sensitivity to the relevant development scale;
- may also be suitable in principle if they are:
  - 1) located in large new development sites, existing industrial estates or if they are proposed in neighbourhood plans or through community energy schemes; ~~and~~
  - 2) it can be clearly demonstrated that the scale of the development is appropriate to the site;
  - 3) the benefits of the development outweigh any harm to the local community; ~~;~~ and
  - 4) that the development complies with the relevant criteria in Policy ES2.

Where appropriate, provision should be made for the removal of the facilities and reinstatement of the site should it cease to be operational.

Particular support will be given to renewable and low carbon energy generation developments that are led by, or meet the needs of local communities.

Comment [1]: Our DM colleagues have suggested impact rather than amenity

Comment [2]: Should there be a discussion on what constitutes major development, where such proposals require an additional word "significant". (NPPF ftn 55)

Comment [3]: There is a potential circular logic here.

If a proposals fails within a suitable area for wind (as defined on the policies map), then is that not already saying the location is suitable? Has appendix B not already covered these constraints?

It isn't clear if appendix B is an opportunities map or a suitability map. It would help to clarify this point and possibly make some reference in the policy / appendix.

Comment [4]: Vague. Sub-clause bullets 2 to 4 largely duplicate clauses (a) to (d)

Formatted: Bulleted + Level: 2 + Aligned at: 1.9 cm + Indent at: 2.54 cm

Comment [5]: Can a proposal successful achieve this? Clause b appears to cover the main issues in any case.

Comment [6]: Is this consistent with NPPF footnote 49 and para 172 (public interest)?

NPPF ftn 49 requires the backing of local communities. The policy doesn't address how this will be dealt with.

Comment [7]: The policy refers back to itself – it would help to make clear what are the relevant criteria (e.g. a to d).

Chapter 6 - Our environment and surroundings

Policy ES1 is central to meeting core objectives relating to the climate emergency. However, a key challenge is the outcome of the government's Future Homes Standard (FHS) consultation. CDC, through its response to the FHS consultation, has expressed its objection to the proposal that would restrict LPAs from adopting more onerous standards. In many respects the SDC local plan is a testbed for innovative policies and approaches in Gloucestershire and CDC will no doubt benefit from SDC's endeavours. Critical to the success of any policy is articulating the context and providing sound and robust evidence.

Policy ES2. It is not clear how the decision maker would use certain aspects of the policy - see attached document.

Finally, Officers wish to thank SDC for supporting and in many cases leading on joint evidence and commissions to the benefit of Gloucestershire LPAs.

Best Wishes,

[Redacted signature]

Cotswold District

[Redacted contact information]

Publica is a company wholly owned by Cotswold District Council, Forest of Dean District Council, West Oxfordshire District Council and Cheltenham Borough Council to deliver local services on their behalf.

**Cotswold District Council has introduced a Community Infrastructure Levy. Any planning application determined on or after 1 June 2019 could be liable to pay this levy. It is important you familiarise yourself with the CIL regulations and procedures. For more information please visit [www.cotswold.gov.uk/CIL](http://www.cotswold.gov.uk/CIL)**