

STROUD DISTRICT LOCAL PLAN REVIEW INSPECTORS MATTERS, ISSUES AND QUESTIONS

Matter 10 Statement
Ecotricity Group Ltd

Matter 10 Environment

Matter 10a Sustainable future

Core Policy DCP1 Delivering Carbon Neutral by 2030

1. Core Policy DCP1 sets a target of achieving net zero by 2030, ahead of the national target which is to achieve the same by 2050.

a) Is this target achievable? Is it justified and viable?

10.1 Ecotricity Group Ltd support Stroud District Council's ambitious objective to be Carbon Neutral by 2030 as set out in Policy DCP1.

10.2 It is noted that the Council's ambition to achieve net zero by 2030 is ahead of the Government Target of Net Zero Carbon by 2050. The SDLPR recognises in Gloucestershire, the County Council and all six local authorities have declared Climate Emergency and have set varying targets for carbon neutrality. In 2015, SDC became the first local authority in Europe to become carbon neutral in terms of its own operation and in 2019 the Council resolved to do everything possible to make the District carbon neutral by 2030. The Council adopted 'The 2030 Strategy' in March 2021, which seeks to address the climate and ecological emergency, to protect the District's character and communities today and for many generations to come.

10.3 To date, the Council has made significant progress. In a press release dated 2nd February 2022¹, it acknowledges that the Council has been named as one of the best in the country for addressing climate change. It states that '*the Council achieved a joint 10th place out of more than 400 local authorities in Great Britain and Northern Ireland, is rated the fourth-best district council in the country, and is the top performer in Gloucestershire. Climate Emergency UK scored SDC at 77% across a range of measures designed to test the effectiveness of councils' climate action plans.*'

10.4 In this context, the positive and aspirational approach being taken in the SDLPR is justified and achievable, and should be encouraged.

¹ <https://www.stroud.gov.uk/news-archive/our-commitment-to-addressing-climate-change-is-one-of-the-best-in-the-country>

c) Are all the policy requirements set out in Core Policy DCP1 justified for a strategic policy and are they achievable? How will a decision-maker determine whether the requirements have been met, for instance how will they know that green infrastructure has been maximised?

10.5 The criteria within the policy should be followed for all new development. Whilst some of the criteria relate to the overall location of development, the majority relate to the design of development and seeking to ensure all opportunities are taken to reduce carbon emissions. The criteria set out what key design principles should be followed when proposing development, which mainly relate to the the masterplanning of development. The criteria also relate to other policies of the plan, namely the Delivery Policies in Sections 5 and 6, as well as specific measures within the individual Site Allocation policies (e.g. Strategic Site Allocation Policy PS20 includes a number of measures required to deliver sustainable transport). The policy is not intended to be read in isolation and sets the overarching strategic direction which other more detailed policies follow.

d) Does the policy strike the right balance between encouraging sustainable modes of transport whilst recognising that in rural areas some local residents and businesses may be more reliant on the private car? Is the policy approach consistent with paragraph 105 of the Framework?

10.6 A key element of the aim to be Carbon Neutral by 2030 is the shift to sustainable modes of transport. Stroud Sustainable Transport Strategy (EB60 and EB108), which forms part of the Evidence Base for the Local Plan, looks to support a substantial modal shift away from cars. This is further supported by the recent publication of the emerging National Policy set out in Decarbonising Transport – A Better Greener Britain (14th July 2021 – EB65).

10.7 Paragraph 2.9.6 of the supporting text to Policy DCP1 highlights that 44% of annual carbon emissions in the District are estimated to arise from transport and 38% from the built environment. As such, it goes on to recognise that measures include *'locating development to minimise the need to travel, particularly by private car.'*

10.8 The NPPF highlights at Paragraph 105 that development should be focussed on locations that are or can be made sustainable, *'through limiting the need to travel and offering a genuine choice of transport modes'*. However, it states that *'opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'*

10.9 The wording of Policy DCP1 is aspirational. It looks for the use of the private car to be discouraged in order *'to deliver the highest possible share of trips by the most sustainable transport modes'*. This policy is aspirational, and therefore positively prepared, but is not considered to be restrictive. This overall message is taken through the CP5 which sets the criteria for strategic sites, as well as Delivery Policy E112 which relates to promoting transport choice and accessibility. These policies, in

combination, seek to deliver development in line with the Sustainable Transport Hierarchy, by prioritising development which have access to services and facilities by walking, cycling and public transport, as well as designing proposals to prioritise active travel modes. The aspiration is seeking to minimise the number and distance of single purpose journeys by private cars. It is recognised that it is not feasible to suggest that private car use will be restricted completely, but instead, looks to encourage other sustainable modes, where possible, to promote these as the most attractive and convenient ways to travel.

10.10 Strategic Site Allocation Policy PS20 includes a number of criteria to ensure that sustainable transport enhancements are prioritised above the provision of additional highway capacity and the use of the private car. This includes: the provision of high-quality walking and cycling routes on and off-site, a multi-modal travel interchange hub to allow for interchange for sustainable modes including bus, bicycle, walking, other forms of personal transport and car sharing, as well as contributions towards sustainable transport measures on the A38 and A419, local bus services, and the re-opening of Stonehouse Bristol Road rail station.

10.11 Criteria 20 of Policy PS20 requires *'any associated infrastructure enhancements required and identified in the Stroud Infrastructure Delivery Plan in this location.'* Ecotricity Group Ltd requests that this is removed as its too open ended and may result in a contribution for highway works that are not required or related to the allocation. All measures are appropriately covered by 10 to 18 and this is therefore unnecessary. Any improvements to the highway network also should be proportionate and shared between all benefiting developments.

e) The policy states that all new development must be designed to discourage the use of the private car, irrespective of fuel source. Does this acknowledge opportunities to encourage EV usage through the provision of, for example, a network of electric charging points across the District, including the rural area?

10.12 The purpose of the second bullet point is 'to deliver the highest possible share of trips by the most sustainable transport modes'. The Glossary within the SDLPR defines 'sustainable transport' as *'all forms of transport which minimise emissions of carbon dioxide and pollutants. It can refer to public transport, car sharing, walking and cycling as well as technology such as electric and hybrid cars and biodiesel'*. This reflects the definition of 'sustainable transport modes' in the NPPF which are *'any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport.'* As such, in line with this, the use of EV vehicles is considered to constitute a mode of sustainable transport, and therefore this should not be discouraged in the policy.

h) Is the policy as a whole consistent with national policy?

10.13 Yes, the NPPF looks to encourage sustainable development. The criteria set out in Policy DCP1 are consistent with:

- The environmental objective of Sustainable Development at Paragraph 8.
- Chapter 9 which relates to Promoting Sustainable Transport. This includes limiting the need to travel and offering a genuine choice of transport modes.
- Chapter 14 which relates to meeting the challenge of climate change, flooding and coastal change. This identifies at Paragraph 152 that *'the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'*
- Chapter 15, which relates to conserving and enhancing the natural environment.