

# **Stroud Local Plan**

## **Examination in Public**

### **Matter 10a – Sustainable Future**

Hearing Statement by Savills on behalf of L&Q Estates

February 2023



### **Core Policy DCP1 Delivering Carbon Neutral by 2030**

#### **10a.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. Core Policy DCP1 appears to be more a statement of intent and an (understandable) desire to make it clear that reducing carbon emissions through sustainable design is the core objective of the Local Plan. Whilst we have a great deal of sympathy with this general approach, the response is somewhat muddled and the policy measures listed duplicate much of content of later, more specific, development management policies.
- b. The first bullet point for example relates to the location of development and the need for new homes to be well located to access essential services and facilities. This should be a function of the selection of the allocations in the pre-submission draft Stroud Local Plan (SLP) and does not need to be stated within a strategic policy<sup>1</sup>.
- c. The references to policy aspirations such as maximising green infrastructure, the energy hierarchy, reducing waste and addressing vulnerability and resilience to climate change are all matters which are addressed through the more detailed development management policies later in the plan. It would not therefore impact the determination of planning application if the provisions of Policy DCP1 were removed from the plan.

### **Sustainable Construction and Design - Delivery Policy ES1**

#### **10a.4. Policy ES1 requires development proposals to meet a number of requirements, including the achievement of a net-zero carbon standard.**

- a. L&Q Estates is committed to addressing the climate crisis however, they are conscious that the standards they propose to secure for new development need to be finely balanced against the viability of development, ability to deliver other priorities and policy requirement, and the feasibility and the practicalities of delivering enhanced standards in a timely manner.

---

<sup>1</sup> Notwithstanding, we have covered in other Statement why we believe that the SLP fails to achieve this through its spatial strategy and selection of strategic allocations.

- b. The SLP references the Future Homes Standard, and indicates that it is seeking to accelerate the move to zero carbon development in advance of the Government timescales. The evidence published by the Government alongside the Future Homes Standard expressly references the need for a staged approach to changing the Building Regulations to reflect the need to develop supply chains, skills and construction practices. In seeking to set a higher standard at an early point, the Authority risks development simply not being achievable due to these barriers.
- c. Notwithstanding the requirement for further evidence, we note that the Authority's viability evidence, concludes that this draft policy requirement (when considered cumulatively alongside other policy requirements) will not result in viable residential development across a number of development scenarios. In response to this the suggestion at paragraph 12.68 of EB111 is that the plan should incorporate provisions to allow for viability testing at the development management stage. Whilst such viability testing is necessary to account for circumstances where there are particularly high abnormal costs or challenges facing the deliverability of a site, they should not be the norm. On the contrary, the cumulative policy requirements of the plan should be demonstrably deliverable on adoption.
- d. This is implicit in NPPF paragraphs 16(b), 34 and 57 all of which relate to the need for Local Plans to be deliverable (at the point of adoption) and have regard to viability. Specifically in relation to 'climate change' policies, the PPG advises that:
- “The National Planning Policy Framework expects local planning authorities when setting any local requirement for a building’s sustainability to do so in a way consistent with the government’s zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability”.* [Paragraph Reference ID: 6-009-20150327]
- e. In addition to the physical costs of the carbon reduction through design, it will also be necessary to identify the financial contributions required to offset the residual carbon generation, as required by the draft policy. This appears to be missing from the viability assessment.

- f. Unless the Authority's net zero policy aspirations are proven to be feasible, viable and achievable in practice (alongside wider development management policies), it will seriously jeopardise the delivery of other priorities and policies, including the delivery of its housing needs, affordable homes, and put into question the deliverability of the Local Plan as a whole. We recommend that the policies are therefore amended to bring the requirement into line with the nationally prescribed Building Regulations.

### **Heat supply – Delivery Policy DES3**

**10a.8 Is this policy supported by the evidence base and is it viable and deliverable? AND**

**10a.9 Does the policy take sufficient account of opportunities to provide communal heating systems when considering issues relating to feasibility (as a separate consideration to viability)?**

- a. We object to Policy DES3 and the establishment of a development management approach which requires viability testing for a communal heat supply. As set out above in relation to Policy ES1, viability evidence is required to demonstrate that this is viable at the point at which a local plan is adopted. The burden of evidence should not be transferred to the applicant to prove that something is not viable if it has not been shown to be viable at the local plan stage.
- b. Notwithstanding the concerns over viability, it is also questionable whether communal systems are necessarily desirable. Heating and energy solutions are evolving at a rapid rate as technology advances and the grid decarbonises. Whilst communal systems may be considered the most effective and suitable system on certain sites that won't be the case on all. It should be left to applicants to determine which solution is the most suitable and effective means of achieving building regulation standards on each individual site.

**Savills**

**1 February 2023**