

SDC Local Plan Consultation

Horsley Parish Council Response

14th January 2020

1. General comment

The background research is of a very high standard and has clearly informed the strategy, notably on renewable energy provision and planning. There are some concerns on policy detail and wording regarding housing development which we expand on below. We also have commented in detail on the carbon neutral proposals.

2. We set out below the proposals we support, and changes we would like to see

Development Strategy

We support the 'hybrid preferred development strategy' for meeting Stroud District's future growth and development needs.

We support the limited development proposals for Horsley Parish, but we have reservations about housing development policy effects on SDLs rural exception sites in Designated Rural areas and AONB.

It is positive that self-build may be more widely encouraged but there are concerns about the roll-out in the context of exception site proposals.

We have concerns over the concept of "in perpetuity" not seemingly surviving, at least, not explicitly. It should be clearly present in the supporting text. There being no justification for its omission - see definition of Exception Sites in NPPF 2019 Annex 2 Glossary, appended here:

Rural Exception Sites: Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.

The measures in the Housing Act 2016 and subsequent legislation regarding the extended definition of affordable housing presumably run alongside the principle of social affordable housing in perpetuity. Newly defined affordable schemes could create more or less the same product as "right to buy" after a period of years and under certain conditions. They seek to widen the definition to include a greater variety or diversity of affordable models within the market but this does not mean that local affordable should be excluded as a legitimate option.

Rural areas with social housing have sustained such losses over the years through Right to Buy to the detriment of provision for local people with insufficient means to access the increasingly expensive housing (*Starter Homes for First-Time Buyers (England)*, H of Commons Library, Briefing Paper No 07643 18 May 2018; also, *Revisions to the NPPF, LGA Briefing 30 July 2018*; and, *Is there place for market housing on rural exception sites?* Neil Harris, RTPI, 5 February 2019.)

Accordingly we would request that "in perpetuity" is reinstated within HC4, to comply with the NPPF definition. It would also be helpful if this is added into the glossary.

3. We would make the following consequential comments

Delivery Policies

HC4 (pp.154-5)

While the aim here is to reflect NPPF support for affordable entry level homes (starter homes), self-build/custom-build alongside other market homes encompassed in the broader definition of “affordable” using the NPPF Glossary, there are insufficient safeguards indicated to promote social housing “in perpetuity”. This apparent omission represents a very significant and regrettable change in policy or how it might be interpreted.

The 2015 Local Plan policy meets rural exception site requirements better and still has provision for some market housing that can encompass the new definitions of market affordable as well as shared housing so it seems unnecessary to replace that good policy with this one, while the Local Plan draft glossary to come could spell out the definition(s) of “affordable” (market and social)?

The anticipated downside to HC4 policy is within the anticipated incentive to develop such sites for market housing (landowners and developers) in spite of all the measures to dis-incentivise investors, and other consequences with a similar long term outcome to right to buy that erodes provision of truly affordable housing for rent (or shared/intermediate housing) in rural communities. With the market orientated policy land price would escalate and make development for social housing out of reach economically, and make opportunities for purchasing land for Community run schemes or CLT development much more challenging (counter to DHC4 which is a good policy).

It has to be borne in mind that even shared and discounted ‘affordable’ market housing in desirable rural areas can achieve market prices of £240,000 and above, which even with schemes and subsidy is well beyond the means of many local people whose aspirations are frustrated, while incomers with better opportunities can benefit.

In addition, it is clear in the NPPF that AONB areas are among those exempt from entry-level exception sites. What is proposed in HC4 is not such a site nor is that the intention but could prove to have a similar outcome/profile if the balance between “affordable” market style starter homes of various types and social housing were to be distorted on viability grounds.

If the intention is to ensure there is social housing in perpetuity as a part of such development it needs to be explicit. The “appropriate legal agreements” (see HC4 Policy para 3 p.155) are non-specific...would these be S106 agreements? How long would these stay as non-market dwellings? The provisions in the Housing Act and subsequent legislation though extended following consultation are still relatively short term.

In many respects incorporating single plots for self-build is good in principle along with the restriction of GIA of 100m². However, while each plot might be “bespoke”, the balance in a rural exception site at the edge of settlement might be hard to maintain as these are effectively market dwellings and could be developed by a builder/provider as a series of small sites or collection of individual plots, albeit “bespoke”. This could escalate land price making social affordable housing provision harder to achieve in such areas. It would be better if this policy could be framed within Community building initiatives on rural exception sites where balance could be maintained, and local need better served.

The goal of or need for “in perpetuity” at rural exception sites is not achieved. The reference to “de minimus” at the end of HC4 suggests there is such an underlying intention though the use of this term could be confusing without the supporting text/glossary by way of explanation.

4. We also set out below our comments on the proposed policies in support of carbon neutrality

Carbon neutrality

We are delighted the District Council has embraced a target of carbon neutrality by 2030, and that 'Moving the District towards becoming Carbon Neutral by 2030, whilst adapting to the impacts of climate change and providing resilience for the future'. We support the stated Vision that includes 'we have responded to climate change, becoming carbon neutral by 2030 and [are] continuing to adapt our lifestyles to live within our environmental limits, including travelling in sustainable ways.'

We support the statements about sustainability, zero carbon development, sustainable transport and biodiversity throughout the document, and particularly in Section 6, entitled Our Environment and Surroundings. We appreciate the recognition that achieving carbon neutrality is a 'cross cutting' issue affecting everything we do.

However, as is stated at in the SDC Plan (page 6) the purpose of the planning system, of which the Local Plan is part, is to achieve sustainable development. All the focus in the Plan is on future development and the need to provide 12,800 homes over the next 20 years – what type and where it should be. We are concerned that there is very little discussion or planning relating to increasing carbon neutrality of the existing asset base in the District.

We do not believe the carbon neutrality target can be achieved without addressing the carbon footprint of what we have in the way of existing housing stock and business premises as well as what might be developed in the future. We would like to see positive support, encouragement and incentives for the retrofitting of existing domestic and business premises, including listed buildings, especially where fuel poverty is an issue.

Climate change 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 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 and sequestering of carbon 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).

Provision for renewable solar and wind energy

We note that the Plan has given consideration to this with the results summarised on maps on pages 206 and 207. However the scale of the maps is too large for them to be interpreted or understood. Given the importance of this medium for future power sources we would like more detailed maps to be presented.

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.

Economy

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 thorough going 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.

Achieving carbon neutrality in agriculture

As a largely rural Parish, we welcome the commitment in Core Policy DCP1 that development must be designed to support local food production. Also, 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 E15 (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.

Delivery and monitoring

Section 7 sets out principles for delivery and monitoring of the Plan, however no reference is made as to how carbon neutrality will be measured, nor whether there is a baseline for current carbon use in the District. If the carbon neutrality intentions of the District are to be achieved it essential more thought is given to this and specific measurement and monitoring activities are set out.

Consistency in the text 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.