

Stroud Town Council

Evidence Base and Policy Development
Final Report

May 2020

Quality information

Prepared by

Jessica Cooke
Graduate Planner

Antje Lang
Consultant- Sustainable &
Resilient Cities

Elliot Aguirre
Consultant – Sustainable &
Resilient Cities

Paul Avery
Housing Research Consultant

Checked by

Jesse Honey
Associate Director

Approved by

Jesse Honey
Associate Director

Revision History

Revision	Revision date	Details	Authorized	Name	Position
Version 1	5 th March 2020	Draft for comment	JH	Jesse Honey	Associate Director
Version 2	19 th April 2020	Draft for comment	KC	Kim Cowan	Stroud Town Council
Version 3	20 th April 2020	Final draft for Locality approval	JH	Jesse Honey	Associate Director

© 2020 AECOM Infrastructure & Environment UK Limited. All Rights Reserved.

This document has been prepared by AECOM Infrastructure & Environment UK Limited ("AECOM") for sole use of our client (the "Client") in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

Disclaimer

This document is intended to aid the preparation of the Stroud Town Neighbourhood Plan and can be used to guide decision making and as evidence to support Plan policies, if the Qualifying Body (QB) so chooses. It is not a neighbourhood plan policy document. It was developed on the basis of information and evidence reasonably available to assessors at the time of assessment. As such, it is a 'snapshot' in time and may become superseded by more recent information. Stroud Town Council is not bound to accept its conclusions. If any party can demonstrate that any of the evidence presented herein is inaccurate or out of date, such evidence can be presented to the Neighbourhood Plan at the consultation stage. Where evidence from elsewhere conflicts with this report, the QB should decide what policy position to take in the Neighbourhood Plan and that judgement should be documented so that it can be defended at the Examination stage.

Table of Contents

Executive Summary	6
Introduction and context.....	6
General findings.....	7
Responding to the Climate Emergency.....	7
Headline summary of policy specific findings (full details in Appendix 1)	8
AP4- General Housing	8
AP9a- Design: General Principles.....	8
AP9b- Design: Public Realm.....	9
AP13- Energy	10
1. Introduction	12
1.1 About this document.....	12
1.2 Local context	13
1.3 Planning Policy and Evidence Base	13
1.3.1 Stroud District Local Plan	13
1.3.2 Neighbourhood plan activity	14
1.3.3 Climate emergency declarations and the planning system.....	15
2. Assessment methodology.....	17
2.1 Assessment of evidence base	17
2.2 Assessment of evidence base (see also Appendix 1).....	17
2.3 Policy review (see also Appendix 1)	18
2.4 Policy wording	18
2.5 About Appendix 1	18
2.6 About Appendix 2	19
2.7 About Appendix 3	19
2.8 About Appendix 4	19
3. Conclusions and Recommendations.....	20
3.1 General findings	20
3.2 Responding to the Climate Emergency	20
3.3 Headline summary of policy specific findings (full details in Appendix 1).....	22
3.3.1 AP4- General Housing.....	22
3.3.2 AP9a- Design: General Principles	23
3.3.3 AP9b- Design: Public Realm	24
3.3.4 AP13- Energy	24
3.4 Next steps.....	25
Appendix 1: Detailed policy and evidence review	26
Appendix 2: Relevant 'made' neighbourhood plan policies	47
Appendix 3: Resources for neighbourhood planning in a climate emergency.....	49
Appendix 4: Further guidance on neighbourhood planning policy.....	50

Abbreviations used in the report

Abbreviation

CIL	Community Infrastructure Levy
DAS	Design and Access Statement
DfT	Department for Transport
EBPD	Evidence Base and Policy Development
EiP	Examination in Public
EU	European Union
HQM	Home Quality Mark
LPA	Local Planning Authority
MHCLG	Ministry of Housing, Communities and Local Government
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
SEA	Strategic Environmental Assessment
SCI	Statement of Community Involvement
SPD	Supplementary Planning Document
SuDS	Sustainable Urban Drainage System
ULEV	Ultra-Low Emission Vehicle

Executive Summary

Introduction and context

1. Stroud Town Council is developing a Neighbourhood Plan for the central part of its designated area, which lies in Stroud District, Gloucestershire.
2. As part of the development of the Neighbourhood Plan and its evidence base, the Town Council applied successfully to Locality for support from AECOM as part of its Supporting Communities in Neighbourhood Planning project.
3. This document comprises the final report of an Evidence Base and Policy Development (EBPD) study provided by AECOM to the Town Council. There has been close communication between the Town Council and AECOM throughout its development and, as such, feedback from the Town Council has informed the final report, including comments on the draft final version.
4. This EBPD covers three main topic areas, as advised by the Town Council, namely housing, design and environmentally sustainable energy. The specific policies reviewed and discussed are as follows:
 - AP4 Homes- general residential
 - AP9a Design- general principles
 - AP9b Design- public realm
 - AP13 Energy
5. Three of the above four policies being reviewed (Design principles, public realm and energy) have crossovers with the Design Guidelines for the Town Council being prepared by AECOM at the same time as this EBPD. As such, there was appropriate co-ordination and cross-referencing as the two reports progressed, and where a topic is covered in both processes, this is noted accordingly.
6. The aim of the EBPD is to review the existing evidence base, identify any gaps within it, and then present policy options and recommendations based not only on the existing evidence base but also on any additional relevant information that applies.
7. Stroud already has a Neighbourhood Plan adopted. The policies named above have been identified as having potential to be amended and strengthened in the next iteration of the Neighbourhood Plan.
8. Therefore, the purpose of this EBPD is to provide further clarity, evidence and innovative suggestions to update and strengthen the policies in the Neighbourhood Plan review, particularly in the context of the Climate Emergencies declared by Stroud District and Town Councils since the last Neighbourhood Plan was adopted (see section 1.3.3 on integrating the Climate Emergency into planning documents below). In addition, the EBPD needs to help ensure that the revised policies continue to meet the Basic Conditions of neighbourhood planning.¹
9. The review of existing policies will be comprehensive, in that it will assess not only the policy text itself but also the evidence upon which that policy is based. It seeks to verify that:
 - Evidence has been assembled from robust sources;
 - Stakeholder-derived evidence has been considered in an inclusive way;
 - Relevant third-party comments/issues have been addressed;
 - Reasonable conclusions have been drawn from that evidence;
 - All useful evidence available has been referenced;
 - There are no evidence gaps that need to be filled;

¹ Available at <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

- The draft policy is clearly written, distinct from and in general conformity with the strategic policies in the development plan; and
 - The policy meets the Basic Conditions.
10. Where the AECOM review finds that the draft policy or the evidence on which it is based has any potential for strengthening or improvement, recommendations in this regard will be clearly set out.

General findings

11. In developing planning policies for the emerging Neighbourhood Plan, the Town Council should ensure that they do not merely repeat existing national and local planning policies. In a robust neighbourhood plan, neighbourhood policies either increase the effectiveness and/or specificity of local plan policies (i.e. by adding local criteria and/or taking local context into account) or propose a policy where there was previously a policy gap.
12. However, when the Town Council supports the LPA's existing policy approach this can simply be referenced in supporting text for the avoidance of doubt rather than comprising a policy in its own right. Equally, developing measurable metrics (targets or indicators) that do not appear in the Local Plan or its monitoring regime that can monitor effects of implementation is another way of ensuring the neighbourhood plan can add value over and above local and national policies.
13. All evidence that the Town Council has relied on in developing their planning policies should be properly documented within the Neighbourhood Plan. The supporting text to each policy must refer to the evidence base used to inform that policy approach, summarising the key points which will help demonstrate how robust the policy is. The supporting text, which should stand alone from and be clearly differentiated from the policy text itself, should explain why the policy is required and signpost the reader to the plan's evidence base where they can find additional information. Policy justification should also refer to the Stroud District evidence base documents and policies, as this will help support the policies and enhance their robustness.
14. Additional evidence work in some cases may be required to enhance the robustness of policies. As a general rule, the more a policy departs from or goes beyond the local plan (e.g. in terms of standards), the more evidence is required. It is recommended that the Town Council conducts a further check of their draft final policies to ensure they are adding value to the Local Plan and are locally specific to the neighbourhood. Ideally this should be done with the LPA's Neighbourhood Planning Officer.

Responding to the Climate Emergency

15. Stroud Town Council has, together with the District Council, declared a climate emergency. Calls for climate change mitigation have been common across the world and at many levels of governance over recent decades, but all too often do not result in immediate or tangible action. It is vital, therefore, if climate emergency declarations are to differentiate itself from previous calls for action, that, where they have been made, they are embedded meaningfully in statutory local and neighbourhood planning policy.
16. This does not, however, mean that embedding will be straightforward, even if the political will to do so is stronger than ever. Based on our analysis of the extent to which viability considerations are a barrier within currently applicable national planning policy, it is suggested that the Town Council exercise a degree of caution, not only in terms of policy wording but also in terms of managing community expectations more generally, when seeking to implement the climate emergency declaration through the Neighbourhood Plan.
17. It is at present by no means certain how Neighbourhood Plan policies responding appropriately to the emergency declaration would perform when tested against the national policy with which they must be in conformity² and in the face of local stakeholders whose financial or other interests may not (at present, at least) necessarily align even with net zero, let alone real zero, carbon neutrality.

² This last sentence applies equally to the District Council. As of February 2020, no Local Plan policies specifically seeking to implement or act on a climate emergency declaration have yet been tested at Examination against national policy- it is strongly recommended that, if possible, the Town Council monitors closely the national picture in this regard over the coming months and years. As climate emergency declarations started to be made from late 2018 onwards, the first policies based on them will likely come to Examination from around late 2020 at the very earliest. While there is potential for Neighbourhood Plans that reference

18. At the moment, there is little detailed information or research available on the potentially difficult relationship between carbon neutrality and development viability in practice. However, as more and more planning authorities seek carbon-neutral development ahead of the Government's own target, and as that national target comes closer, this is likely to change rapidly, and it is recommended that the Town Council monitor emerging best practice in this regard in Stroud District and beyond.

Headline summary of policy specific findings (full details in Appendix 1)

AP4- General Housing

19. While the broad scope of the policy is worth retaining in its next iteration, there is also great potential to add depth and specificity to ensure that its objectives are achieved as effectively as possible.
20. This is most apparent for the criterion relating to the desired range of housing, which is currently repetitive of Local Plan policy and potentially redundant. This criterion could be expanded to address a number of clearly defined aspects with evidenced policy requirements.
21. The new HNA evidence provides ample justification to ensure that the new policy, and this criterion in particular, is more ambitious in various ways:
 - addressing more explicitly the topic of tenure and affordability, by stating or referencing the scale of need for affordable housing, and encouraging development that maximises its provision;
 - defining the target balance within affordable housing between affordable rented tenures and affordable home ownership products;
 - specifying whether the appropriate range of housing types and sizes in Stroud is one that is diverse in and of itself, or one that addresses imbalances as compared with the wider district;
 - citing the target mix of dwelling sizes the HNA identifies as best positioned to serve the evolving needs of the population (allowing for a large degree of flexibility);
 - going beyond the Local Plan's declaration of support for housing that meets the needs of older people by requiring that new development meets defined accessibility and adaptability standards; and
 - promoting the delivery of specialist housing for older people and those with support needs.
22. The HNA evidence with regard to the challenge of housing affordability may also be cited in design policies relating to the energy efficiency of buildings, since reducing fuel bills could improve housing access for those on lower incomes in particular.
23. The policy criteria pertaining to a) outdoor space, b) ground level access, c) self-, custom and cooperative housing, and d) development outside of the floodplain, are effective as drafted. These do not require additional evidence or require refinement on the basis of the HNA findings. That said, the policy explanation could benefit from more detail on the feasibility of providing outdoor space and how it should be provided in practice.
24. Depending on how far the neighbourhood planners wish to evolve and expand AP4 in its next iteration, it may be clearer to divide it into a number of separate policies, as is typical in many other neighbourhood plans. If the current approach of a single policy is preferred, careful attention should be paid to formatting, punctuation, and the function of its first paragraph in order to aid comprehension.

AP9a- Design: General Principles

25. It seems logical and rational for the next iteration of the policy to carry its existing basic elements forward, suitably strengthened and with detail added. The environmental components of the evidence relate well to national legislation and/or non-statutory technical standards and also align well with Stroud District's emerging local objectives.

26. Since the original Neighbourhood Plan was made, the intervening declaration of a climate emergency at District and Town levels should be cited as part of the evidence base underpinning the policy and appropriately referenced in supporting text. At the time of writing, Stroud's Draft Local Plan (2019) forms, for the purposes of neighbourhood planning, evidence rather than policy. It has several policies that align well with and are particularly relevant to AP9a which could therefore be referenced within and inform/or the supporting and/or policy text of its next iteration. Further evidence that could effectively support a replacement policy AP9a is set out in Appendix 3: Resources for neighbourhood planning in a climate emergency.
27. Clarification on the definition of external lighting would be helpful. Existing policy gaps that have potential to be addressed through the next iteration of AP9a include: maximising net gains in biodiversity; siting and orienting development to maximise passive solar gain; requiring adequate and appropriate space for recycling and composting of waste; ensuring thermal efficiency and environmental sustainability in building materials; requiring native planting and/or fruit and nut trees; minimising urban heat island effects and/or internal overheating; and mention of green walls and/or green roofs.
28. There is potential for some policy requirements to be worded as more strictly integral to/holistic within the design of the development as otherwise there is a risk that they might be provided alongside and/or appear as a token afterthought to development, while still technically according with the policy.
29. There are five additional ways to enhance the effectiveness not only of AP9a but also all other plan policies in the context of the climate emergency declaration, as follows:
 - Spell out to Plan users exactly what the climate emergency declaration means for the Neighbourhood Plan;
 - Refresh the Plan's overall vision (welcoming, healthy and thriving) to put climate change mitigation, adaptation and environmental sustainability centre stage.
 - Add performance in terms of climate change mitigation and adaptation as a Monitoring topic in Table 2;
 - Add a glossary of technical terms- not just to aid comprehension but also to clarify what the Plan means when it refers to individual concepts that could be ambiguous; and
 - Add clarity and consistency to the Plan's internal structure (i.e. a clearer, more intuitive flow from vision to strategic objectives, to policy objectives, to policies. In terms of AP9a and AP9b specifically, there are more strategic objectives that could/should flow through to form policy objectives.
30. It is considered that in the case of AP9a, significant policy strengthening could be achieved through implementing the recommendations in this report without unsurmountable impacts on development viability.
31. In formulating revisions to Policy AP9a, the recommendations of this EBPD should be taken into account alongside relevant conclusions from AECOM's separate but complementary Design Guidelines report.

AP9b- Design: Public Realm

32. The guidance in Appendix 6 does not relate particularly strongly to environmental sustainability or climate change adaptation or mitigation and therefore has great potential for being expanded and updated. In so doing, the Town Council should consider in particular if the balancing of priorities (here, heritage versus climate emergency) might indicate that greater encouragement for tree planting may be justified.
33. The existing definition of Public Realm for the purposes of AP9b is narrow, and this could be considered a current gap. Apart from planting, it focuses mainly on 'hard' landscaping. However, there are many 'softer' landscape elements that not only could be considered part of the public realm already but also should be included if the policy is to respond better to the climate emergency in future.
34. Existing policy gaps that have potential to be addressed through the next iteration of AP9b (either in the policy itself or in Appendix 6, as appropriate) are as follows:

- More explicit encouragement of, and references to, cycling infrastructure in the public realm;
 - More explicit encouragement of, and references to, walking in the public realm;
 - Reference to and guidance on the size, form and location of electric vehicle charging points;
 - Greater clarity on and promotion of (ideally native, and food-producing) tree planting and tree cover as a vital component of the public realm;
 - Consideration of climate change adaptation measures (alongside mitigation measures) in the public realm;
 - Referencing the potential for, and setting appropriate requirements for, climate-friendly external drainage features;
 - For those parts of the public realm that could also be defined as green infrastructure, ensuring the policy seeks a) its retention, enhancement and expansion, b) ecologically-friendly maintenance techniques and c) net biodiversity gain;
 - Recognising that the above requirements will need to be balanced appropriately against heritage considerations.
35. An excellent example of up-to-date best practice public realm planning that could be taken into account for the harder landscaping elements of Policy AP9b is the City of London's recent 'City Cluster' report.
36. It is considered that significant policy strengthening could be achieved through implementing the recommendations in this report without unsurmountable impacts on development viability.
37. In formulating revisions to Policy AP9b, the recommendations of this EBPD should be taken into account alongside relevant conclusions from AECOM's separate but complementary Design Guidelines report.

AP13- Energy

38. The declaration of a climate emergency at District and Town levels should be cited as part of the evidence base underpinning the policy and appropriately referenced in supporting text.
39. At the time of writing, Stroud's Draft Local Plan (2019) forms, for the purposes of neighbourhood planning, evidence rather than policy. It has several policies that align well with and are particularly relevant to AP9a which could therefore be referenced within and inform/or the supporting and/or policy text of its next iteration.
40. The reference to the 2012 NPPF needs to be replaced by the relevant 2019 NPPF text. There is also potential to cite as supporting evidence further 2019 NPPF text on low-carbon energy generation because it is more exacting in terms of renewable and low-carbon energy. For low emission vehicle charging facilities, the policy could set out specific requirements. For example, instead of stating 'charging facilities for plug in vehicles should be provided where practical', a minimum percentage should be required.
41. For local renewable energy generation - as the policy stands, giving support to renewable energy in principle with no further detail has now become a simple restatement of national policy. As such, significant further, locally specific detail and evidence is needed, such as, for example:
- Requiring stringent minimum energy efficiency standards (for both residential and non-residential development);
 - Seeking opportunities to retrofit renewable energy generation to existing development when there is the opportunity to do so through planning permissions;
 - Recognising the importance of the policy cycle, in other words, setting AP13 in the context of the wider process to reduce carbon emissions;
 - Clarity in the supporting text on whether community-led renewables infrastructure has ever been trialled in the Neighbourhood Plan area, and if so, what the outcomes were- and if not, why not;
 - Specific renewables infrastructure and/or specific locations suitable for its installation should be mentioned, what the criteria for support would be (if relevant), and how it might be funded, for example through developer contributions;

- Mentioning the potential or otherwise for a district heating scheme;
 - Requiring a carbon reduction plan to be submitted as part of a development application; and
 - Recognising that the above requirements will need to be balanced appropriately with their potential impact on statutorily-protected heritage assets.
42. The policy consists of three sentences in a single paragraph, each seeking a separate objective (renewable energy generation, charging for low-emission vehicles and electric cycle charging). Its effectiveness would likely be enhanced if it were split into separate paragraphs or clauses, particularly given that the recommendations in this EBPD are likely to result in the text increasing in length in any case.
 43. The adopted policy had to use relatively weak language (“promoted”, “should be”, “encouraged”) which reduces its effectiveness. The 2019 NPPF, by contrast, justifies firmer text such as ‘should’, ‘require’ and so on.
 44. The five neighbourhood-plan wide recommendations made in the effectiveness section of the review of Policy AP9a above would also, if implemented, have significant potential to enhance the effectiveness of policy AP13.
 45. As a cautionary point, while more restrictive wording is certainly justified in the current policy context, the Town Council should prepare for a degree of resistance from the development industry on viability grounds and have appropriate regard to sections 1.3.3 and 3.2 of this report when considering how it might be strengthened.
 46. In formulating revisions to Policy AP13, the recommendations of this EBPD should be taken into account alongside relevant conclusions from AECOM’s separate but complementary Design Guidelines report.

1. Introduction

1.1 About this document

47. The 2011 Localism Act introduced neighbourhood planning, allowing parishes or neighbourhood forums across England to develop and adopt legally binding development plans for their neighbourhood area.
48. Stroud Town Council is developing a Neighbourhood Plan for the central part of its designated area, which lies in Stroud District, Gloucestershire.
49. As part of the development of the Neighbourhood Plan and its evidence base, the Town Council applied successfully to Locality for support from AECOM as part of its Supporting Communities in Neighbourhood Planning project.
50. This document comprises the final report of an Evidence Base and Policy Development (EBPD) study provided by AECOM to the Town Council. There has been close communication between the Town Council and AECOM throughout its development and, as such, feedback from the Town Council has informed the final report, including comments on the draft final version.
51. This EBPD covers three main topic areas, as advised by the Town Council, namely housing, design and environmentally sustainable energy. The specific policies reviewed and discussed are as follows:
 - AP4 Homes- general residential
 - AP9a Design- general principles
 - AP9b Design- public realm
 - AP13 Energy
52. Three of the above four policies being reviewed (Design principles, public realm and energy) have crossovers with the Design Guidelines for the Town Council being prepared by AECOM at the same time as this EBPD. As such, there was appropriate co-ordination and cross-referencing as the two reports progressed, and where a topic is covered in both processes, this is noted accordingly.
53. The aim of the EBPD is to review the existing evidence base, identify any gaps within it, and then present policy options and recommendations based not only on the existing evidence base but also on any additional relevant information that applies.
54. Stroud already has a Neighbourhood Plan adopted. The policies named above have been identified as having potential to be amended and strengthened in the next iteration of the Neighbourhood Plan.
55. Therefore, the purpose of this EBPD is to provide further clarity, evidence and innovative suggestions to update and strengthen the policies in the Neighbourhood Plan review, particularly in the context of the Climate Emergencies declared by Stroud District and Town Councils since the last Neighbourhood Plan was adopted (see section 1.3.3 on integrating the Climate Emergency into planning documents below). In addition, the EBPD needs to help ensure that the revised policies continue to meet the Basic Conditions of neighbourhood planning.³
56. The review of existing policies will be comprehensive, in that it will assess not only the policy text itself but also the evidence upon which that policy is based. It seeks to verify that:
 - Evidence has been assembled from robust sources;
 - Stakeholder-derived evidence has been considered in an inclusive way;
 - Relevant third-party comments/issues have been addressed;
 - Reasonable conclusions have been drawn from that evidence;

³ Available at <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

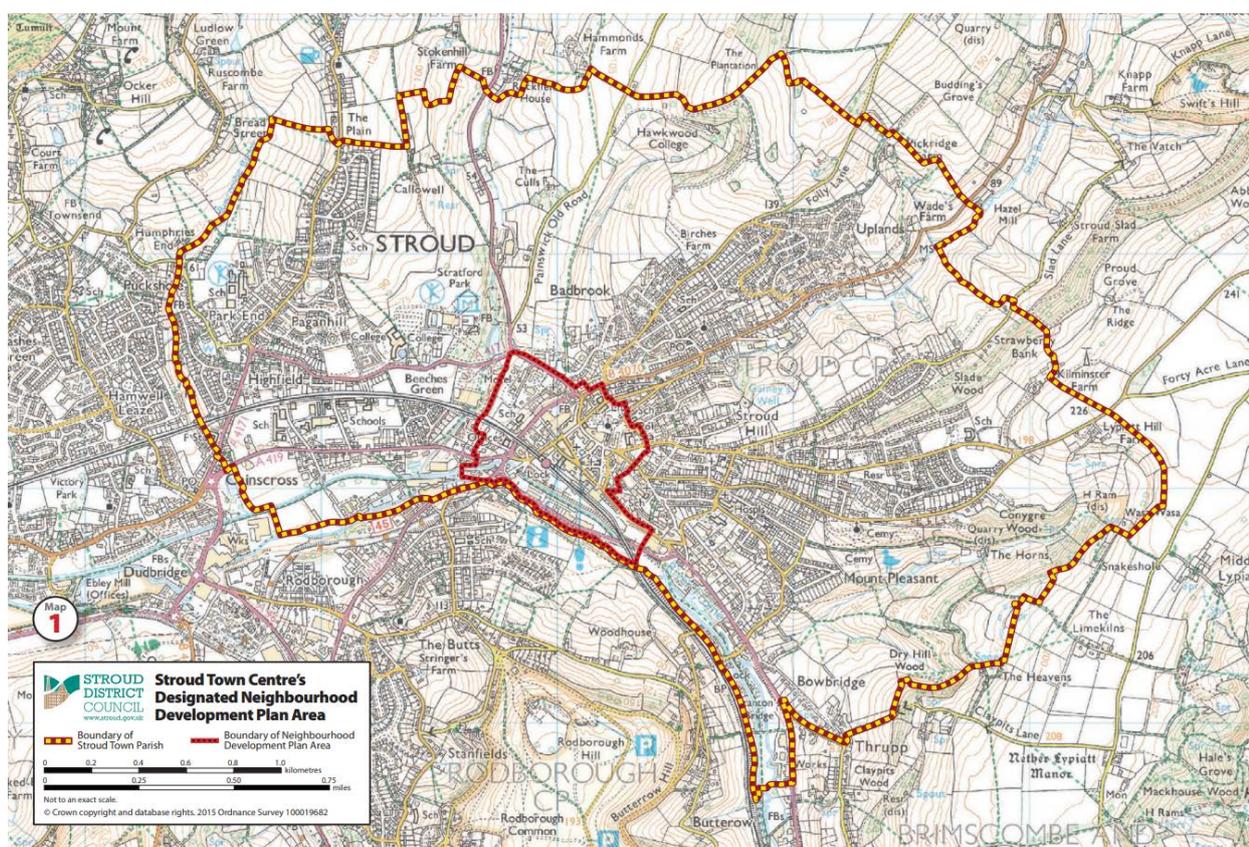
- All useful evidence available has been referenced;
- There are no evidence gaps that need to be filled;
- The draft policy is clearly written, distinct from and in general conformity with the strategic policies in the development plan; and
- The policy meets the Basic Conditions.

57. Where the AECOM review finds that the draft policy or the evidence on which it is based has any potential for strengthening or improvement, recommendations in this regard will be clearly set out.

1.2 Local context

58. Figure 1 below illustrates the Neighbourhood Plan area. It covers the town centre of Stroud parish.

Figure 1: Stroud Town Neighbourhood Plan Area



Source: *Stroud Town Neighbourhood Plan*⁴

1.3 Planning Policy and Evidence Base

59. This sub-section summarises the local planning policy and evidence base available at the district and the Neighbourhood Plan levels.

1.3.1 Stroud District Local Plan

60. The Stroud District Local Plan⁵ was adopted in 2015. It provides an overview of the District and how it should evolve during the plan period (up to 2031). Crucially, it determines how, where and when various kinds of development will be distributed around the District, including the provision of new homes and employment land.

⁴ Available at: <https://www.stroud.gov.uk/media/208653/ndp-64-web-version.pdf>

⁵ Available at: https://www.stroud.gov.uk/media/1455/stroud-district-local-plan_november-2015_low-res_for-web.pdf

61. Core Policy CP3 (Settlement Hierarchy) designates Stroud as 'Accessible Local Service Centres-First Tier' and Core Policy CP12 (Town Centres and Retailing) designates Stroud as the 'Principal Town Centre'.
62. This Plan is currently under review. An Emerging Strategy Paper was published in November 2018 and consultation was carried out in early 2019. The District Council then published the draft Local Plan, clearly setting out emerging new policies, and held a public consultation between November 2019 and January 2020. While this EBPD has rightly taken the draft Local Plan into account, given that its emerging policies carry a degree of weight now that they have been subjected to public consultation, clearly these are only the first iteration, and there is a long way to go before final adoption in 2-3 years' time, with significant potential for them to be amended and modified in the meantime. Clearly, therefore, the taking into account of emerging draft policies is one of the elements of this EBPD report that can only ever be a snapshot in time and the Town Council will have to monitor the development of these emerging policies alongside the review of the Neighbourhood Plan itself.

1.3.2 Neighbourhood plan activity

Adopted Neighbourhood Plan (2016)

63. The first Neighbourhood Plan for Stroud Town was adopted in 2016. Since then, it has formed part of the development plan. The three years during which the Plan has been in place have highlighted areas for improvement in some existing policies; monitoring policy implementation and feeding it back into the next iteration of policies in this way is a vital part of the policy cycle/process.
64. The existing adopted policies, together with draft emerging policies, separate comments received from the District Council, the Planning Inspectorate, the Town Green Spaces Manager and the Centre for Sustainable Energy will be collectively reviewed and then applied to evidence the case for revision to existing policies.
65. The Town Council seeks the revision of existing policies not only to make them more practical and robust, to allow for ease of application in the real world, but also to bring sustainability to the forefront in the context of the Climate Emergency declared both by the District and the Town Councils- and thus also contribute to Stroud's Earth Protector Town Status.⁶
66. There are 5 goals for Earth Protector Towns;
 - Produce a strategy and a date to achieve a carbon zero future;
 - Practice the movement from sustainable to regenerative living wherever possible;
 - Protect and enhance eco-systems, habitats and species in and around the town;
 - Pioneer the reduction and elimination of single use plastic; and
 - Promote awareness of climate and ecological emergencies.
67. Stroud Town Council aims to incorporate these goals by creating policies to action them in the revised neighbourhood plan.
68. Following this EBPD report, the Town Council intends to undertake further consultation to evidence the potential new and/or revised policies. The Plan will then be submitted to SDC prior to further external examination and the final public referendum. The Town Council has stated that they aim to complete this process within 18 months to two years.

Other relevant evidence documents

69. At project inception, the Town Council provided AECOM with a range of other relevant evidence documents relating to the Neighbourhood Plan. These comprise:
 - Green Spaces Management Plan⁷ (the primary neighbourhood plan-level green spaces evidence base document);

⁶ Detailed information about Earth Protector Communities is available at <https://earthprotectorcommunities.net/>

⁷ Available at: <https://stroudtown.gov.uk/wp-content/uploads/GREEN-SPACES-MANAGEMENT-PLAN-UPDATED-OCT-2015-final.pdf>

- Stroud District Local Plan Review, Emerging Strategy Consultation Report⁸ (the current consultation evidence base document); and
- Climate Change Report⁹ (the main neighbourhood plan-level sustainability evidence base document).

70. These evidence base documents have been reviewed as appropriate throughout this report.

1.3.3 Climate emergency declarations and the planning system

71. One of the main differences in the policy context between the original neighbourhood plan and its forthcoming replacement is that in the interim period, both the District Council and the Town Council have declared a climate emergency. The declaration of the climate emergency is reflected in the emerging new Local Plan, which, as noted above, seeks, through draft Policy DCP1, for Stroud to be carbon-neutral by 2030.¹⁰
72. It is, however, important to note when discussing how these and other climate emergency declarations impact on planning policy, that the Government itself has not declared a climate emergency¹¹.
73. The reason this is relevant is that it remains to be seen whether emerging policies seeking complete carbon neutrality ahead of the Government's own 2050 target, such as that being progressed by Stroud District, will be able to pass through the Local Plan Examination process intact. At Examination, this and other policies will be tested for their conformity with national policy in the shape of the NPPF, which has not itself been updated in response to climate emergency declarations. The NPPF, while seeking sustainable development, defines such development as an equal balance between economic, social and environment sustainability; these are described as 'three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (Paragraph 8).
74. Though not stated in the NPPF, in practice, these three objectives often come into conflict and have to be resolved through balanced judgement that takes national policy, and the local policies in conformity with it, into account. By contrast, planning policy at any level driven by a climate emergency declaration could (arguably, but reasonably) be expected to privilege environmental sustainability over the other two objectives in cases where, as often occurs, they come into conflict.
75. In national policy, the NPPF 'must be taken into account in preparing the development plan' (paragraph 2), but there is no obligation or requirement at present to take climate emergency declarations into account in plan-making (though they can be treated as 'material considerations' in planning decisions themselves).
76. The NPPF, and national planning guidance, has also over recent years become much more focussed on the implementation and delivery of development on the ground, requiring local plan policies to be deliverable and viable in this regard. As such, any new restrictions on, or requirements of, development and developers, including but not limited to carbon reduction measures, has to effectively pass a test of viability in order for it to be adopted into local planning policy (and hence part of the neighbourhood plan context).
77. As there will be significant impacts on development viability if Stroud District is to become carbon-neutral by 2030¹², it can be expected that Policy DCP1 will be subject to robust challenge by

⁸ Available at: <https://www.stroud.gov.uk/media/1032747/local-plan-review-emerging-strategy-consultation-report.pdf>

⁹ Available at: <https://stroudtown.gov.uk/wp-content/uploads/Climate-Change-Report-from-Cllr-Alan-Sage.pdf>

¹⁰ There is also strong support for reductions to net zero carbon at the county/sub-regional level- see, for example, Gloucestershire Local Enterprise Partnership's draft Local Industrial Strategy at https://www.qfirststep.com/downloads/2020/gloucestershire_draft_local-industrial-strategy_2019-updated.pdf and Sustainable Energy Strategy at <https://www.qfirststep.com/downloads/2019/gloucestershire-energy-strategy-2019.pdf>.

¹¹ While Parliament (as distinct from the Government) declared a climate emergency in May 2019, this has so far not been reflected in statutory legislation. The declaration was itself reflective of the fact that at the time, the Government (which had not at the time, and has not since, declared a climate emergency) was not able to command a majority in the House of Commons. Since this declaration, the Parliament that made it has been dissolved and in the new Parliament resulting from the General Election of December 2019, the Government has a majority in the Commons. As such, as of this writing (February 2020) there are no immediate signs of climate emergency declarations (by Parliament or any other party) being reflected or acknowledged in emerging national planning legislation or guidance.

¹² A possible indicator of the urgency of considering how development could remain viable and deliverable under climate emergency-informed policy is the fact that the District Council's current thinking on how the emergency declaration might be implemented in practice appears not to consider development viability or deliverability- see

<https://www.climateemergency.uk/wp-content/uploads/2019/07/Stroud-Implementation-of-Climate-Change-Motion.pdf>

developers and other parties who have an interest in maximising the viability of new development- and that the NPPF and planning guidance will, for the reasons described above, facilitate this challenge. Research by the Town and Country Planning Association (TCPA)¹³ states that viability requirements are *'the dominant factor in the weakening or removal of climate change policy...the viability test was perhaps the pre-eminent factor in explaining the gap between the imperative in the NPPF for carbon reduction and actual delivery on the ground, since it allowed developers to argue that any measure that compromised the profitability of the highly speculative 'current trader' development model should not be included in plan policy.'*

78. In this context, it should also be noted that as worded, DCP1 appears to seek 'real zero' rather than 'net zero' carbon neutrality¹⁴, which has even more potential to impact on development viability, as it is generally agreed that net zero emissions (for example, through offsetting- and what the Government is aiming for by 2050) is significantly easier to achieve than 'real' zero emissions¹⁵.
79. For this reason, the extent to which Policy DCP1 will survive Examination or consultation in its present form is an open question at the time of writing. This is an excellent example of how neighbourhood planners need to be cautious when seeking to align their neighbourhood plan with emerging rather than adopted policy, particularly, as in this case, where emerging policy differs significantly from adopted policy and indeed from national policy.
80. Neighbourhood and local authority planners across the country are grappling with the issue of how to respond with appropriate urgency to climate emergency declarations through planning policy while not rendering development unviable.
81. A good example of this is Teignbridge District in Devon, which declared a climate emergency in April 2019. The Council's planning officers subsequently reported to Council members on the difficult viability trade-offs that would be necessary if carbon emissions were to be reduced sharply and quickly¹⁶: *'It should be noted however that requiring the achievement of reduced carbon emissions and the provision of electric vehicle infrastructure may lead to increasing viability difficulties for developers. There is therefore a possibility that other planning gains (such as affordable housing, community facilities etc.) sought through the development management process may need to be balanced when determining applications.'*
82. AECOM's recommendations and conclusions to the Town Council on how the replacement policies this report focusses on, as well as (necessarily) the Plan as a whole, could respond to the climate emergency declaration is set out in our Conclusions section below.

¹³ 'Planning for the Climate Challenge? Understanding the Performance of English Local Plans' (TCPA, 2016)- available at <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=7d92ec4c-09f7-4b21-9d22-b1aad77fd062>

¹⁴ The phrase 'net zero' appears nowhere in the emerging Local Plan.

¹⁵ For example, see <https://www.nytimes.com/2020/01/21/climate/greta-thunberg-davos-transcript.html>

¹⁶ Report available at:

<https://democracy.teignbridge.gov.uk/documents/s7696/Call%20in%20App%201%20Exec%20Rep%20Planning%20policies-Climate%20Change%20APP.pdf>

2. Assessment methodology

2.1 Assessment of evidence base

83. The evidence base for neighbourhood planning needs to be 'proportionate', i.e. relating well in terms of breadth, depth and scope to the policy being proposed. In line with this approach, the Government's Planning Practice Guidance (PPG) expects most evidence in neighbourhood planning to be 'secondary' (i.e. already collected by another party, making evidence gathering more of an exercise in assembling, interpreting and showing understanding of existing data).
84. Any evidence used should be clearly referenced and presented in an accessible way to justify policies, both for the purpose of examination and for the benefit of residents reading a plan as well as interested parties such as landowners, developers and service providers, all of whom may be impacted by the plan.
85. Evidence can come from several sources, including:
- the adopted and/or emerging Local Plan (from a policy conformity perspective¹⁷);
 - Local Plan evidence base studies that inform policy documents (e.g. the Strategic Housing Land Availability Assessment or equivalent and any sustainability evidence produced by the District Council);
 - technical primary evidence generated or commissioned by the Town Council itself (e.g. those documents listed at the end of Chapter 1 above);
 - stakeholder-derived primary evidence generated or commissioned by the Town Council (e.g. surveys of local households and/or businesses); and
 - relevant national reports, studies and data, such as the 2011 Census¹⁸.

2.2 Assessment of evidence base (see also Appendix 1)

86. AECOM's evidence review focuses on three lines of inquiry:
- **Policy understanding**, which summarises what assessors understand the policy intent to be and follows on from an inception call with the group.
 - **Evidence assembly**, which covers basic checks including:
 - Whether evidence has been gathered from verifiable and appropriate sources;
 - Whether any third party comments have been considered (e.g. from developers, landowners, statutory bodies): and
 - Whether there are any gaps and obvious sources not referred to (e.g. Local Plan background studies).
 - **Evidence analysis**, which considers whether the evidence referred to has been appropriately interpreted, analysed and reasonable conclusions reached in drawing up policy. A distinction is made between stakeholder-derived (e.g. from local household or business surveys) and technical evidence in terms of how the evidence informed policy, although both are treated as equally important. This stage of the review also considers:
 - Whether evidence is, on balance, proportionate; and

¹⁷ In applying basic condition 'e,' 'general conformity' relates to the adopted, not emerging Local Plan (see PPG, Paragraph: 065 Reference ID: 41-065-20140306). However, the evidence behind any emerging Local Plan, as well as the emerging Local Plan itself, is part of the evidence base for the NDP and it is important the NDP takes account of policy development within it given that, once adopted, the new Local Plan policies will supersede those in the NDP. Note that it is because the emerging Local Plan for the moment forms evidence rather than policy for the purposes of the emerging Neighbourhood Plan (even though the latter may be adopted ahead of the former) that the emerging plan policies have been assessed under the 'Evidence Base' rather than the 'Policy Conformity' heading in Appendix 1.

¹⁸ While the evidence in the 2011 Census is increasingly out of date as of 2020, there is no alternative but to continue to cite it in town planning evidence until it is superseded by the full data from the 2021 Census, which will likely not be available in full until 2022.

-Whether the evidence has already had a degree of external scrutiny (e.g. from the Local Planning Authority, LPA) in which case such comments are considered.

2.3 Policy review (see also Appendix 1)

87. After examining the evidence that underpins each policy, the review considers the following questions in terms of meeting the Basic Conditions¹⁹ of a neighbourhood plan:

- Is the policy spatial in nature and therefore within the scope of a development plan or is it supporting a community project? If the latter, it could be retained in the Neighbourhood Plan but listed as a project rather than a statutory policy;
- Can the policy be reasonably interpreted and implemented by planning officers in District Council development management when determining planning applications?
- Does the policy have due regard to national policy and guidance?
- Does the policy comply with applicable human rights law?
- Is the policy in general conformity with adopted strategic local plan policy and is it in conformity (or have potential to be in conformity with) emerging policy? Does it add value to those policies, rather than restating its principles?
- Is the policy clearly written and easy to understand for plan users in general other than development management officers?

2.4 Policy wording

88. Planning practice guidance²⁰ states:

“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”

89. Precise wording of policies is, broadly speaking, considered a matter more for the neighbourhood group itself than for AECOM, based not only on the conclusions and recommendations of this report, but also considering feedback from other relevant stakeholders, including the local community and the LPA.

90. Nevertheless, in cases where minor changes to policy wording may have the effect of increasing soundness and robustness, we have set out any changes we recommend (which, as with all our conclusions and recommendations, comprise non-binding advice).

91. Where significant re-drafting of policy wording is required, we have signposted useful toolkits and Examiners' comments. See Appendix 4.

92. We have undertaken a review of the evidence available to support the draft policies emerging in the documentation sent to AECOM by the Town Council. From this, we have identified any gaps within the evidence base that has been gathered to date by the Town Council and also provided comment on future work or actions needed to ensure a robust policy approach.

2.5 About Appendix 1

93. Appendix 1 is our detailed review of each policy using the methodology described above which considers the draft policies alongside the policies of the adopted and emerging Local Plans, relevant evidence base documents and the National Planning Policy Framework (NPPF)²¹. It aims to provide an answer to the questions raised above. Recommendations are provided in terms of

¹⁹ For further information on the basic conditions, please see 'How to write a basic conditions statement available' here: <https://mycommunity.org.uk/wp-content/uploads/2016/08/How-to-write-a-basic-conditions-statement.pdf>

²⁰ Paragraph: 041 Reference ID: 41-041-20140306, available online at <https://www.gov.uk/guidance/neighbourhood-planning--2>

²¹ Available online at

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf

actions the Town Council should take in terms of further evidence gathering and/or policy development.

94. The row headings in the Appendix 1 table can be explained as follows:

- **Policy name, number and theme:** The policy name and number as it appears in the Draft Plan. Wherever possible, policies are grouped into themes;
- **Policy intent:** This row summarises AECOM's understanding of the policy's intent;
- **Evidence source and type:** This row identifies and checks the source of evidence and whether it is technical evidence or based on local surveys and engagement;
- **Evidence analysis:** This row analyses whether the evidence has been appropriately analysed and reasonable conclusions drawn;
- **Proportionality and gaps:** This row indicate, in AECOM's view, whether the evidence is proportionate and where further potentially useful evidence in support of the policy, theme or objective could be found and referenced;
- **Effectiveness of the policy:** This row analyses whether the evidence is clearly written, easy to understand and implementable;
- **Conformity:** This row provides AECOM's assessment of the extent to which the policy conforms with the relevant policies or provisions of the Local Plan, the NPPF and/or the local plan evidence base as well as with human rights and European law; and
- **Conclusion and recommendations:** This row summarises our review of the policy and outlines our overall recommendations for any necessary changes to policy or evidence, including whether specific issues need to be discussed with third parties to develop the policy further (e.g. the LPA or service providers). If we consider that a policy should be deleted entirely, for example because it duplicates Local Plan policy, we state this here.

2.6 About Appendix 2

95. Appendix 2 lists policies in 'made' (i.e. adopted) neighbourhood plans from across England that are relevant to some of the policies that have been assessed at Stroud. The value of assessing a 'made' plan policy is that it has passed Examination and thus must be in full conformity with the basic conditions of neighbourhood planning.
96. For reasons of consistency, wherever possible, the examples of policies from 'made' plans have been taken from those where AECOM advised the group, but in some cases a relevant policy can only be found in other 'made' plans.
97. If any of the policy examples in Appendix 2 are considered of particular interest or relevance, then it may be helpful to search online for the relevant neighbourhood plan Examiner's Report, which should in every case be available online (if it is not, contact the relevant Local Authority). The Examiner's Report may show how and why the policy in question was amended to conform with the Basic Conditions, unless the draft policy was considered to meet the Basic Conditions without amendment.

2.7 About Appendix 3

98. Appendix 3 sets out resources, evidence and toolkits available to neighbourhood planners with a specific focus on responding to the climate emergency and/or embedding environmental sustainability, climate change mitigation and adaptation into neighbourhood plan policy.

2.8 About Appendix 4

99. Appendix 4 briefly sets out further information on neighbourhood plan policy drafting, including links to resources that may be helpful in this regard.

3. Conclusions and Recommendations

3.1 General findings

100. In developing planning policies for the emerging Neighbourhood Plan, the Town Council should ensure that they do not merely repeat existing national and local planning policies. In a robust neighbourhood plan, neighbourhood policies either increase the effectiveness and/or specificity of local plan policies (i.e. by adding local criteria and/or taking local context into account) or propose a policy where there was previously a policy gap.
101. However, when the Town Council supports the LPA's existing policy approach this can simply be referenced in supporting text for the avoidance of doubt rather than comprising a policy in its own right. Equally, developing measurable metrics (targets or indicators) that do not appear in the Local Plan or its monitoring regime that can monitor effects of implementation is another way of ensuring the neighbourhood plan can add value over and above local and national policies.
102. All evidence that the Town Council has relied on in developing their planning policies should be properly documented within the Neighbourhood Plan. The supporting text to each policy must refer to the evidence base used to inform that policy approach, summarising the key points which will help demonstrate how robust the policy is. The supporting text, which should stand alone from and be clearly differentiated from the policy text itself, should explain why the policy is required and signpost the reader to the plan's evidence base where they can find additional information. Policy justification should also refer to the Stroud District evidence base documents and policies, as this will help support the policies and enhance their robustness.
103. Additional evidence work in some cases may be required to enhance the robustness of policies. As a general rule, the more a policy departs from or goes beyond the local plan (e.g. in terms of standards), the more evidence is required. It is recommended that the Town Council conducts a further check of their draft final policies to ensure they are adding value to the Local Plan and are locally specific to the neighbourhood. Ideally this should be done with the LPA's Neighbourhood Planning Officer.

3.2 Responding to the Climate Emergency

104. It is clear that Stroud has a long and distinguished record of action on the climate crisis. It gave birth to Extinction Rebellion, which is now a worldwide movement. More recently, it pioneered the designation of Earth Protector Towns and has, together with the District Council, declared a climate emergency. Calls for climate change mitigation have been common across the world and at many levels of governance over recent decades, but all too often do not result in immediate or tangible action. It is vital, therefore, if climate emergency declarations are to differentiate itself from previous calls for action, that, where they have been made, they are embedded meaningfully in statutory local and neighbourhood planning policy.
105. This does not, however, mean that embedding will be straightforward, even if the political will to do so is stronger than ever. Based on our analysis of the extent to which viability considerations are a barrier within currently applicable national planning policy as set out in section 1.3.3 above, it is suggested that the Town Council exercise a degree of caution, not only in terms of policy wording but also in terms of managing community expectations more generally, when seeking to implement the climate emergency declaration through the Neighbourhood Plan.
106. It is at present by no means certain how Neighbourhood Plan policies responding appropriately to the emergency declaration would perform when tested against the national policy with which they must be in conformity²² and in the face of local stakeholders whose financial or other interests may not (at present, at least) necessarily align even with net zero, let alone real zero, carbon neutrality.

²² This last sentence applies equally to the District Council. As of February 2020, no Local Plan policies specifically seeking to implement or act on a climate emergency declaration have yet been tested at Examination against national policy- it is strongly recommended that, if possible, the Town Council monitors closely the national picture in this regard over the coming months and years. As climate emergency declarations started to be made from late 2018 onwards, the first policies based on them will likely come to Examination from around late 2020 at the very earliest. While there is potential for Neighbourhood Plans that reference climate emergency declarations to be 'made' earlier than this, at the time of writing there also do not appear to be any 'made' Neighbourhood Plans whose policies seek to respond to a climate emergency declaration.

107. At the moment, there is little detailed information or research available on the potentially difficult relationship between carbon neutrality and development viability in practice. However, as more and more planning authorities seek carbon-neutral development ahead of the Government's own target, and as that national target comes closer, this is likely to change rapidly, and it is recommended that the Town Council monitor emerging best practice in this regard in Stroud District and beyond.
108. As both the District Council and the Town Council have declared climate emergencies, and both are progressing statutory plans seeking to reflect that declaration, they are effectively in the same boat, and this brings mutual advantage as they test together the viability of carbon neutral policy in the short to medium term. As such, the first and most obvious recommendation to the Town Council is to pay careful attention to the views of local consultees expressed to the District Council, in particular on draft policy DCP1, at the Regulation 18 consultation that ran from late November 2019 to late January 2020- the consultee response will be published in full by the District Council in the coming weeks or months. These responses will be used to shape the next iteration of the Local Plan but could also usefully shape policies in the emerging Neighbourhood Plan.
109. The neighbourhood plan appears to be progressing its review cycle ahead of the Local Plan's. If this is the case, it offers both the Town and District Councils a significant opportunity to test how far it is possible to go on environmental sustainability requirements given the primary of viability considerations in national guidance. This is because the tests for viability, both in terms of development and whole plan viability, are less onerous at neighbourhood plan than at Local Plan level.
110. In this context, one option for the Town Council would be to test consultee reaction to a draft Neighbourhood Plan whose policies (along the lines of draft policy DCP1) are as restrictively worded in terms of environmental requirements as the Town Council thinks is necessary to reflect the urgency conveyed by the climate emergency declaration. Depending on consultee responses, the Town Council could then submit either a similar or an appropriately amended, but still strongly environmentally-focussed, Neighbourhood Plan to the District Council for Examination, and leave it to the Examiner to test the balance and priority of Plan policies against the Basic Conditions, including in terms of conformity with adopted local and national policy.
111. Such a strategy would rely on the fact that at neighbourhood level, Examiners are much more likely, if they are concerned about the viability or deliverability of policies, to apply such amendments as they think are necessary and then recommend the amended plan proceed to referendum (only a handful of the thousand or so Neighbourhood Plans that have been examined have failed). At Local Plan Examinations, by contrast, concerns about the viability or deliverability of policies are more likely to lead to an Inspector recommendation that the plan be withdrawn entirely- while this is still relatively rare, it is significantly more common than at Neighbourhood Plan examinations.
112. In this way, how the Neighbourhood Plan fares would act as a useful pointer for the District Council as it prepares its own policies for examination- and providing such indirect assistance to the District Council is presumably in the interests of the Town Council as well- given that a climate emergency has been declared by both organisations, the Town Council presumably has a strong interest in the District Council's Policy DC1 being adopted relatively unchanged or undiluted from its current wording.
113. Finally, it is also clear that in the past, neighbourhood plan Examiners have in some cases set the bar significantly lower for evidence that policies would be viable than would be the case at Local Plan level.
114. One such example comes from Hurstpierpoint and Sayers Common Neighbourhood Plan²³ in Mid Sussex, which was adopted in 2015. At the time, there was no specific affordable housing percentage in local policy, but the Neighbourhood Plan (Policy Housing Hurst7) sought a figure of 30% affordable homes on development of four dwellings or more, despite presenting no viability evidence supporting that percentage. The Examiner, in his report²⁴, did not question or refer to the lack of viability evidence, rather simply requiring the addition of the words 'generally' and 'normal requirement' to indicate flexibility and to ensure the policy confirmed with the then applicable NPPF

²³ Available at <http://www.hurstpierpoint-pc.org.uk/files/general/PARISH%202031%20NP%20MADE%20version%20%2020%20March%202015%20final.pdf>

²⁴ Available at https://www.midsussex.gov.uk/media/3181/hurstpierpoint_and_sayers_common_np_examination_report.pdf

paragraph 173 requiring development not to be subject to such a scale of obligations that the ability to develop viably is threatened²⁵, as well as Mid Sussex Local Plan Policy H4.

115. This suggests that there is precedent at neighbourhood plan level at least (albeit probably not at Local Plan level) for policies with a potentially significant impact on development viability (here, affordable housing requirements, but potentially also carbon neutrality) to pass Examination, even with relatively light evidence supporting them, as long as their wording is flexible enough to ensure conformity with adopted local and national policy.
116. As such, the Town Council could enhance the chances that policies with even relatively environmentally stringent requirements might get adopted through appropriate use of flexible language allowing appropriate exceptions, such as 'generally' or 'normally'. Even better, and more specific, would be 'where viable to do so', but probably best of all is the negative phrasing 'except where demonstrably unviable to do so' as this is clearest in putting the onus on the developer to set out, in a transparent or 'open book' way, why development might be rendered unviable and can be the starting point for dialogue resulting in a mutually acceptable solution.
117. The unfortunate necessity of having to 'water down' policy requirements to some extent through flexible wording was also recognised by the TCPA research on climate change policy in the planning system quoted in section 1.3.3. It states in its review of Local Plan policies on climate change requirements: '*There [are] a limited number of cases in which the language of policy was clear and directive, involving words such as 'must' and 'should'....the majority of policy was framed using qualified and much vaguer language such as 'should normally' or 'should consider'. Policy increasingly directly reflected the viability test, by simply stating that the policy outcome should be delivered 'where viable' or 'where feasible'. This approach defers the question of whether a specific outcome, such as SuDs, is delivered to site-by-site assessments of viability*'.

3.3 Headline summary of policy specific findings (full details in Appendix 1)

3.3.1 AP4- General Housing

118. While the broad scope of the policy is worth retaining in its next iteration, there is also great potential to add depth and specificity to ensure that its objectives are achieved as effectively as possible.
119. This is most apparent for the criterion relating to the desired range of housing, which is currently repetitive of Local Plan policy and potentially redundant. This criterion could be expanded to address a number of clearly defined aspects with evidenced policy requirements.
120. The new HNA evidence provides ample justification to ensure that the new policy, and this criterion in particular, is more ambitious in various ways:
- addressing more explicitly the topic of tenure and affordability, by stating or referencing the scale of need for affordable housing, and encouraging development that maximises its provision;
 - defining the target balance within affordable housing between affordable rented tenures and affordable home ownership products;
 - specifying whether the appropriate range of housing types and sizes in Stroud is one that is diverse in and of itself, or one that addresses imbalances as compared with the wider district;
 - citing the target mix of dwelling sizes the HNA identifies as best positioned to serve the evolving needs of the population (allowing for a large degree of flexibility);
 - going beyond the Local Plan's declaration of support for housing that meets the needs of older people by requiring that new development meets defined accessibility and adaptability standards; and
 - promoting the delivery of specialist housing for older people and those with support needs.
121. The HNA evidence with regard to the challenge of housing affordability may also be cited in design policies relating to the energy efficiency of buildings, since reducing fuel bills could improve housing access for those on lower incomes in particular.

²⁵ This has been replaced in the 2019 NPPF by paragraph 34: '*Plans should set out the contributions expected from development.... such policies should not undermine the deliverability of the plan.*'

122. The policy criteria pertaining to a) outdoor space, b) ground level access, c) self-, custom and cooperative housing, and d) development outside of the floodplain, are effective as drafted. These do not require additional evidence, or require refinement on the basis of the HNA findings. That said, the policy explanation could benefit from more detail on the feasibility of providing outdoor space and how it should be provided in practice.
123. Depending on how far the neighbourhood planners wish to evolve and expand AP4 in its next iteration, it may be clearer to divide it into a number of separate policies, as is typical in many other neighbourhood plans. If the current approach of a single policy is preferred, careful attention should be paid to formatting, punctuation, and the function of its first paragraph in order to aid comprehension.

3.3.2 AP9a- Design: General Principles

124. It seems logical and rational for the next iteration of the policy to carry its existing basic elements forward, suitably strengthened and with detail added. The environmental components of the evidence relate well to national legislation and/or non-statutory technical standards and also align well with Stroud District's emerging local objectives.
125. Since the original Neighbourhood Plan was made, the intervening declaration of a climate emergency at District and Town levels should be cited as part of the evidence base underpinning the policy and appropriately referenced in supporting text. At the time of writing, Stroud's Draft Local Plan (2019) forms, for the purposes of neighbourhood planning, evidence rather than policy. It has several policies that align well with and are particularly relevant to AP9a which could therefore be referenced within and inform/or the supporting and/or policy text of its next iteration. Further evidence that could effectively support a replacement policy AP9a is set out in Appendix 3: Resources for neighbourhood planning in a climate emergency.
126. Clarification on the definition of external lighting would be helpful. Existing policy gaps that have potential to be addressed through the next iteration of AP9a include: maximising net gains in biodiversity; siting and orienting development to maximise passive solar gain; requiring adequate and appropriate space for recycling and composting of waste; ensuring thermal efficiency and environmental sustainability in building materials; requiring native planting and/or fruit and nut trees; minimising urban heat island effects and/or internal overheating; and mention of green walls and/or green roofs.
127. There is potential for some policy requirements to be worded as more strictly integral to/holistic within the design of the development as otherwise there is a risk that they might be provided alongside and/or appear as a token afterthought to development, while still technically according with the policy.
128. There are five additional ways to enhance the effectiveness not only of AP9a but also all other plan policies in the context of the climate emergency declaration, as follows:
- Spell out to Plan users exactly what the climate emergency declaration means for the Neighbourhood Plan;
 - Refresh the Plan's overall vision (welcoming, healthy and thriving) to put climate change mitigation, adaptation and environmental sustainability centre stage.
 - Add performance in terms of climate change mitigation and adaptation as a Monitoring topic in Table 2;
 - Add a glossary of technical terms- not just to aid comprehension but also to clarify what the Plan means when it refers to individual concepts that could be ambiguous; and
 - Add clarity and consistency to the Plan's internal structure (i.e. a clearer, more intuitive flow from vision to strategic objectives, to policy objectives, to policies. In terms of AP9a and AP9b specifically, there are more strategic objectives that could/should flow through to form policy objectives.
129. It is considered that in the case of AP9a, significant policy strengthening could be achieved through implementing the recommendations in this report without unsurmountable impacts on development viability.

130. In formulating revisions to Policy AP9a, the recommendations of this EBPD should be taken into account alongside relevant conclusions from AECOM's separate but complementary Design Guidelines report.

3.3.3 AP9b- Design: Public Realm

131. The guidance in Appendix 6 does not relate particularly strongly to environmental sustainability or climate change adaptation or mitigation and therefore has great potential for being expanded and updated. In so doing, the Town Council should consider in particular if the balancing of priorities (here, heritage versus climate emergency) might indicate that greater encouragement for tree planting may be justified.

132. The existing definition of Public Realm for the purposes of AP9b is narrow, and this could be considered a current gap. Apart from planting, it focuses mainly on 'hard' landscaping. However, there are many 'softer' landscape elements that not only could be considered part of the public realm already but also should be included if the policy is to respond better to the climate emergency in future.

133. Existing policy gaps that have potential to be addressed through the next iteration of AP9b (either in the policy itself or in Appendix 6, as appropriate) are as follows:

- More explicit encouragement of, and references to, cycling infrastructure in the public realm;
- More explicit encouragement of, and references to, walking in the public realm;
- Reference to and guidance on the size, form and location of electric vehicle charging points;
- Greater clarity on and promotion of (ideally native, and food-producing) tree planting and tree cover as a vital component of the public realm;
- Consideration of climate change adaptation measures (alongside mitigation measures) in the public realm;
- Referencing the potential for, and setting appropriate requirements for, climate-friendly external drainage features;
- For those parts of the public realm that could also be defined as green infrastructure, ensuring the policy seeks a) its retention, enhancement and expansion, b) ecologically-friendly maintenance techniques and c) net biodiversity gain;
- Recognising that the above requirements will need to be balanced appropriately against heritage considerations.

134. An excellent example of up-to-date best practice public realm planning that could be taken into account for the harder landscaping elements of Policy AP9b is the City of London's recent 'City Cluster' report.

135. It is considered that significant policy strengthening could be achieved through implementing the recommendations in this report without unsurmountable impacts on development viability.

136. In formulating revisions to Policy AP9b, the recommendations of this EBPD should be taken into account alongside relevant conclusions from AECOM's separate but complementary Design Guidelines report.

3.3.4 AP13- Energy

137. The declaration of a climate emergency at District and Town levels should be cited as part of the evidence base underpinning the policy and appropriately referenced in supporting text.

138. At the time of writing, Stroud's Draft Local Plan (2019) forms, for the purposes of neighbourhood planning, evidence rather than policy. It has several policies that align well with and are particularly relevant to AP9a which could therefore be referenced within and inform/or the supporting and/or policy text of its next iteration.

139. The reference to the 2012 NPPF needs to be replaced by the relevant 2019 NPPF text. There is also potential to cite as supporting evidence further 2019 NPPF text on low-carbon energy generation because it is more exacting in terms of renewable and low-carbon energy. For low

emission vehicle charging facilities, the policy could set out specific requirements. For example, instead of stating 'charging facilities for plug in vehicles should be provided where practical', a minimum percentage should be required.

140. For local renewable energy generation - as the policy stands, giving support to renewable energy in principle with no further detail has now become a simple restatement of national policy. As such, significant further, locally specific detail and evidence is needed, such as, for example:

- Requiring stringent minimum energy efficiency standards (for both residential and non-residential development);
- Seeking opportunities to retrofit renewable energy generation to existing development when there is the opportunity to do so through planning permissions;
- Recognising the importance of the policy cycle, in other words, setting AP13 in the context of the wider process to reduce carbon emissions;
- Clarity in the supporting text on whether community-led renewables infrastructure has ever been trialled in the Neighbourhood Plan area, and if so, what the outcomes were- and if not, why not;
- Specific renewables infrastructure and/or specific locations suitable for its installation should be mentioned, what the criteria for support would be (if relevant), and how it might be funded, for example through developer contributions;
- Mentioning the potential or otherwise for a district heating scheme;
- Requiring a carbon reduction plan to be submitted as part of a development application; and
- Recognising that the above requirements will need to be balanced appropriately with their potential impact on statutorily-protected heritage assets.

141. The policy consists of three sentences in a single paragraph, each seeking a separate objective (renewable energy generation, charging for low-emission vehicles and electric cycle charging). Its effectiveness would likely be enhanced if it were split into separate paragraphs or clauses, particularly given that the recommendations in this EBPD are likely to result in the text increasing in length in any case.

142. The adopted policy had to use relatively weak language ("promoted", "should be", "encouraged") which reduces its effectiveness. The 2019 NPPF, by contrast, justifies firmer text such as 'should', 'require' and so on.

143. The five neighbourhood-plan wide recommendations made in the effectiveness section of the review of Policy AP9a above would also, if implemented, have significant potential to enhance the effectiveness of policy AP13.

144. As a cautionary point, while more restrictive wording is certainly justified in the current policy context, the Town Council should prepare for a degree of resistance from the development industry on viability grounds and have appropriate regard to sections 1.3.3 and 3.2 of this report when considering how it might be strengthened.

145. In formulating revisions to Policy AP13, the recommendations of this EBPD should be taken into account alongside relevant conclusions from AECOM's separate but complementary Design Guidelines report.

3.4 Next steps

146. This neighbourhood plan evidence base and policy review has aimed to provide the Town Council with recommendations on policy and evidence for the next iteration of the Stroud Town Neighbourhood Plan. We recommend that the Town Council should, as a next step, integrate our conclusions and recommendations, alongside those of the complementary Design Guidelines report, into the emerging draft policies, at which point they can be resubmitted to Stroud District Council for their informal/unofficial comment in advance of formal submission.

Appendix 1: Detailed policy and evidence review

Policy name and number	AP4- General Housing
AECOM understanding of policy intent	<p>The policy has three broad aims. These are:</p> <ul style="list-style-type: none"> • to increase the provision of housing in the centre of Stroud and optimize the use of development land; • to improve housing choice (in terms of type, size, design and delivery models), and thereby increase the diversity of the area’s inhabitants; and • to support health and wellbeing by ensuring that outdoor space is provided alongside new dwellings. <p>The policy wording is clearly linked to the stated objectives, and helpfully expanded upon in the supporting explanation. Its intentions and scope form a broad foundation that should be brought forward into the next iteration of the policy. However, there is ample room for the policy to be strengthened and expanded.</p>
Evidence source and type	<p>The evidence supporting the policy consists of references in the introduction to the ‘relatively few people living in the designated area’ and the ‘comparatively high proportion [of people] under 30 years old, male and living in privately rented, mainly flat-type accommodation’. This information is based on statistics presented in Appendix 2 that are derived from the 2011 Census. The town of Stroud as a whole is used as the comparator for the assertions of ‘relatively few’, and ‘comparatively high’, which is considered appropriate.</p> <p>The policy requirements for outdoor space and ground floor access are justified as ways to support the well-being of residents and ensure that new living space is sufficiently high-quality and attractive to increase demand from diverse potential new residents. This is a reasonable assumption, and the policy position does not require quantitative evidence. This is proven by the fact that it withstood the scrutiny of the inspector when the Plan was originally adopted.</p> <p>The same is true of the stipulation that new development should be located outside of the floodplain. Further evidence is not required to justify this.</p>
Evidence analysis	<p>Given the limited nature of the evidence supporting the policy overall, its relatively limited scope and prescriptiveness as currently drafted are appropriate. However, AECOM has recently produced a Housing Needs Assessment (HNA) for the emerging Stroud Neighbourhood Plan. This provides a clear opportunity to strengthen the evidence supporting the current policy wording, as well as to expand the scope of the next iteration of the policy and enhance its effectiveness.</p> <p>On the assumption that the new HNA will form the primary source of evidence for housing policy in the refreshed Plan, the approach taken here is to analyse the HNA rather than the limited evidence cited in the current version of the Plan, with a view to identifying its implications for the potential additions and changes to the next iteration of Policy AP4.</p> <p>Given that the HNA evidence represents AECOM’s own conclusions, this analysis is focused on the strength of the evidence in terms of its significance rather than the quality of the underlying methodology.</p> <p>Before reviewing the HNA’s implications in detail, it is worth noting that the geographical boundary it investigates is that of Stroud Parish rather than the designated Neighbourhood Plan area (NA).²⁶ Although the difference in boundary does not invalidate the evidence in the HNA for the purposes of neighbourhood planning, there is an extent to which differences in the characteristics of the wider Parish and smaller NA should be taken into account when translating that evidence into policy. For example, it may reasonably be assumed that the relatively more urban character of the NA means that the oversupply</p>

²⁶ This was agreed at the inception of the HNA with the Town Council.

of flats within it is even higher than that identified in the wider Parish, and that a policy response to diversify dwelling types is therefore justified to a greater extent than the evidence suggests.

Below, key findings from the HNA that may have a bearing on the evolution of Policy AP4 are presented and discussed to help determine how policy might evolve. For ease of reference, each HNA chapter or topic area is considered in turn.

Tenure and affordability:

- The policy explanation states that increasing the diversity of people living in the town centre will be achieved, in part, by increasing the rate of owner occupation. The evidence confirms that there is indeed a significantly lower proportion of home ownership in the Parish than the District or nationally. However, the policy introduction refers to a comparatively high proportion of privately rented accommodation. Despite doubling between 2001 and 2011, private renting was not found (compared with wider geographies) to be so extensive as to need to de-emphasise it in the tenure mix.
- That said, evidence relating to the affordability of housing in the NA would support efforts to increase home ownership at the expense of private renting (for those who aspire to ownership) through the provision of relevant affordable housing products. There is a substantial cohort of households in Stroud who can afford to rent but cannot afford to buy, although they have incomes at or above the average. Market homes for sale (at both mean and lower quartile prices) are well beyond what median earning households can afford, while they can afford to rent. There is therefore a gap in the market that could be filled by affordable home ownership products, such as shared ownership, rent to buy, and discounted market housing. The government is also consulting on a new 30% discounted product called First Homes that might be suitable in Stroud.²⁷ The Local Housing Needs Assessment for Gloucestershire (LHNA, 2019) suggests that potential demand for such products could be in the region of 27 dwellings per year in Stroud Parish as a whole.
- Such products are defined as affordable housing, which is of finite quantity, and thus are potentially delivered at the expense of other forms of affordable housing, such as social rent, rather than mainstream housing for sale on the open market. The blend of different affordable housing products that is delivered can be directed by policy, to some extent (site viability and the availability of willing providers also play a part).
- The lowest earning households in Stroud, with one individual earning a lower quartile income, cannot afford any tenure of housing other than social rent. The LHNA suggests that need for affordable rented housing could be in the region of 23 households per year in the Parish. This will not be delivered solely through the provision of affordable housing at 30% of market housing (in line with Local Plan Policy CP9) because there is not enough planned new housing to achieve this. Since the needs of households who can only afford social rent are more urgent than those of households who can rent but can't buy, they could be prioritised when planning for new housing (a similar prioritisation is proposed in the LHNA).
- In relation to affordable housing, it is relatively common for planning policy to include a target balance between affordable rented accommodation and affordable home ownership products. The explanation accompanying Policy CP9 in the adopted Local Plan states that 'viability evidence indicates that a tenure split of 50% affordable rent and 50% intermediate tenure would be viable for the majority of sites'. (This detail is not included in the draft Local Plan). Although the HNA does not take viability evidence at the scale of Stroud Parish into account, the evidence with regard to affordability would appear to support diverging from the 50-50% tenure split to give more weight to affordable rented accommodation where viable. The HNA proposes a tenure split of 70% affordable rented housing and 30% affordable home ownership. However, there is also evidence (as above) pointing to the value of affordable home ownership products.
- As such, should the neighbourhood planners wish to propose an affordable housing tenure split in the next iteration of the Plan, the HNA evidence is flexible enough for it to be set in accordance with community priorities and objectives. A revised policy could either seek to uphold the 50-50% policy, to depart from it to prioritise affordable rented housing to a greater degree, or to remain silent on the issue. The Town Council may wish to discuss this issue with the LPA. Existing best practice is generally to present a tenure split as a broad target or range, and to allow for flexibility subject to viability. See the example policy from the Sid Valley Neighbourhood Plan referenced in Appendix 2.
- The total identified quantity of need for affordable housing of all types is higher than expected delivery levels. As such, this evidence would justify the establishment of a Community Land Trust or the allocation of an affordable housing (or entry-level) exception site in the Neighbourhood Plan. However,

²⁷ The consultation is available here: <https://www.gov.uk/government/consultations/first-homes>

Local Plan Policy HC4 (which features in the adopted and draft versions) already provides adequate policy support for such activities, so this need not be repeated in the next iteration of AP4.

- The HNA demonstrates that median and lower quartile incomes in the local area are not sufficient to afford an entry-level market home and an entry-level market rental property, respectively. This assumes that a household cannot afford to spend more than 25% of its gross income on rent or mortgage costs. It follows that reducing other household costs would enable the saving to be spent on mortgage payments or rent, bringing a wider range of housing tenures within reach. One such cost is utility bills, which can be reduced for inhabitants of dwellings that are built to high standards of energy efficiency. The effort to improve the affordability of housing in this way also dovetails with the Town and District's declaration of a climate emergency. Measures to reduce energy use through the design of buildings are justified by affordability evidence in addition to Stroud's wider goals.

Type and size:

- The main distinctive characteristic of Stroud's mix of dwelling types is that the proportion of flats is twice as large as in the wider district, and the proportion of detached houses is half as large as in the district. If it is desired that the Neighbourhood Area more closely resemble wider geographies in this respect, there is justification to diversify the housing stock away from flats.
- However, there are also arguments against this. Statistically, because it is more evenly distributed between the various types, it could be argued that the dwelling mix in the Parish as a whole is more balanced and diverse than that of the wider district. Further, if the objective of greater diversity were to be pursued, it would be best achieved through the provision of detached homes (the least common type). This could potentially come into conflict with other policy objectives, such as making 'the most efficient use of land and buildings' in a part of the town that already has a high density of dwellings. If diversity of type is sought, it may therefore be more appropriate to require that the present mix is broadly maintained, so as to permit new flats but not allow them to be the dominant type of new housing. However, policy to govern housing type should be approached with caution, or presented with a high degree of flexibility, because dwelling type is strongly affected by site-specific factors and viability, and overly-prescriptive policy may risk preventing development from coming forward altogether. See the example policies from the Ashted and Botesdale & Rickingham Neighbourhood Plans referenced in Appendix 2.
- The dwelling mix in terms of size represents a more appropriate issue, and more compelling justification, for policy intervention. Stroud Parish has a much higher proportion of one-bedroom dwellings than the wider district or England, and a lower proportion of housing with four or more bedrooms. In the period between 2001 and 2011, the quantity of one and two room housing experienced the fastest growth rate. Linked to this, nearly a quarter of households in the Parish are single occupiers under the age of 65 (compared to 15% across the wider district), and this group was the fastest growing between 2001 and 2011. These linked findings corroborate the finding presented in the existing policy introduction and would justify stronger wording in support of a larger dwelling mix to provide greater diversity of choice.
- The HNA sets out an ideal dwelling size mix, in percentage terms, for accommodating the population as it is likely to evolve over the Plan period. There was found to be no further need for one-bedroom properties, and that more than half of new dwellings should have four or more bedrooms. This is, however, merely a guideline based on a modelling exercise, and enforcing it precisely through policy would be overly prescriptive. Nevertheless, the policy may be strengthened to more specifically favour a higher proportion of larger homes in new development in order to serve the community's anticipated needs.

Older and younger households:

- If greater diversity in the population is among the community's objectives, the demographic evidence presented in the HNA suggests that older people are a particularly under-represented group. This may be because the available housing in the neighbourhood area meets their needs and preferences to a lesser extent than other locations, but other reasons are likely to also exist.
- As above, the simplest and most impartial approach to creating a mixed community through housing is to diversify the range of types and sizes on offer. If, however, the neighbourhood planners wish to actively cater to older households as the population ages, the HNA evidence would support the promotion of specialist housing and/or more ambitious building regulations to support accessibility and adaptability.

	<ul style="list-style-type: none"> • The HNA estimates that between 287 and 396 additional older households with support needs will require some form of specialist accommodation during the Plan period. The policy could therefore encourage the provision of specialist housing schemes, either through supportive language or a target percentage of larger-scale developments. See the example policy from the Thurston Neighbourhood Plan referenced in Appendix 2. • In addition to this, or if specialist housing schemes are found not suitable or viable in the neighbourhood area (at least on the scale required), the policy could include provisions relating to the adaptability and accessibility of new housing. This is typically achieved through requirements that a certain proportion of new dwellings are built to M4 Category 2 (accessible) and M4 Category 3 (wheelchair-friendly, either adapted or adaptable) building regulation standards. According to recent updates to Planning Practice Guidance (PPG),²⁸ there is a low burden of justification required to pursue such a step in planning policy. In Stroud, due to the growth in the older population and support in PPG it would be justified, for example, to require that all new housing is built to Category 2 standard, and that a small percentage is built to Category 3 standard. See the example policy from the Wincanton Neighbourhood Plan referenced in Appendix 2. • The HNA identified an estimated 423 potential newly forming households that may seek their own accommodation during the Plan period. The best way to facilitate the formation of these independent households is to provide sufficiently affordable housing options, particularly since a combined 53% of them are estimated to need subsidised affordable housing. While the policy could be enhanced by giving explicit support to development that seeks to meet their needs, the options related to securing affordable housing (discussed above) are perhaps more relevant to this group.
<p>Proportionality and gaps</p>	<p>At the time of writing, Stroud's Draft Local Plan (2019) forms, for the purposes of neighbourhood planning, evidence rather than policy. It has several policies that align well with and are particularly relevant to AP4 which could therefore be referenced within and inform/or the supporting and/or policy text of its next iteration. The neighbourhood plan policy should not, of course, repeat elements of local policy (the majority of which feature in the adopted as well as the draft versions), but there are some gaps in local policy that the neighbourhood plan could meaningfully fill. The draft Local Plan policies with relevance to AP4 (or the HNA evidence) are summarised below, with potential gaps or potential for avoiding repetition commented upon after each.</p> <p>DGP2 (Supporting Older People) encourages developments that enable older people to live independently in their own home.</p> <ul style="list-style-type: none"> • Although meeting the needs of older people is not an explicit aim of AP4 as currently drafted, it would be justified by the new HNA evidence. Should the neighbourhood planners wish to take this further and add specificity to the relatively broad DGP2, AP4 could require that a set proportion of new homes meet M4 Category 2 and Category 3 building regulation standards for accessibility and adaptability. This would be in close conformity with DGP2, which is focused on independent living and ageing in place. • AP4 could also be strengthened in relation to the needs of older residents by encouraging the provision of specialist accommodation for older households with support needs. Although this is not in strict conformity with DGP2, it is in conformity with the 2019 NPPF and is justified by the HNA evidence. <p>CP7 (Lifetime Communities) requires developers to demonstrate how major development will contribute to identified needs, including among older people and people with special needs.</p> <ul style="list-style-type: none"> • As above. This policy declares broad support for meeting the needs of older people, but leaves room for the Neighbourhood Plan to be more explicit as to how this could be achieved. <p>CP8 (New Housing Development) calls for a range of types, tenures and sizes of housing to create mixed communities. Its criteria relate primarily to density, streetscape, design and construction techniques.</p> <p>HC1 (Detailed Criteria for New Housing Developments) sets out a number of criteria that new residential development must meet, including a variety of dwelling types and sizes to meet identified local need.</p> <ul style="list-style-type: none"> • These policies are relatively general in their calls for an appropriate range of housing. As currently drafted, AP4 does not add significant value to them. However, the generality of CP8 leaves room for the next iteration of AP4 to specify what constitutes an appropriate range of housing in the NA. It could do so by either pointing to the evidence furnished by the HNA or specifying a target range of dwelling sizes for new development to deliver. • It is not considered desirable to be overly prescriptive with regard to dwelling types (detached, terraced, etc.).

²⁸ <https://www.gov.uk/guidance/housing-for-older-and-disabled-people#identifying-the-housing-requirements-of-older-and-disabled-people>

	<ul style="list-style-type: none"> • It would be useful for AP4 to state an explicit position with regard to the issue of tenure, and the potential for this is discussed with regard to Policy CP9 below. <p>CP9 (Affordable Housing) cites the projected quantity of need for affordable housing, seeks for affordable housing to meet local needs in terms of type and size, and requires that sites capable of providing 10 or more dwellings provide 30% affordable housing.</p> <ul style="list-style-type: none"> • This policy requires that new development provide a set percentage of affordable housing. Departing from such a requirement demands a high standard of justification and evidence relating to development viability, and such a step is not recommended in this case. The most appropriate response to Stroud's acute affordable housing need is to allocate an exception site for affordable housing, for which provision is made in HC4 below. • Policy CP9 itself is silent on what proportion of affordable housing should be delivered as affordable rented tenures versus affordable home ownership products. The reasoned justification alongside CP9 in the adopted Local Plan puts forward a target tenure split of 50% rented and 50% routes to home ownership, but this is not carried forward into the reasoned justification of the draft Plan. The HNA evidence would support specifying a target tenure split in the Neighbourhood Plan that either remains in conformity with the 50-50% split in the adopted Local Plan (which might bear repeating if it is to be dropped from the emerging version) or adjusts it to prioritise the more urgent need for affordable rented housing. Because the HNA evidence is equivocal, whether and how far to adjust this split is a matter that can be determined by community objectives. <p>HC2 (Providing New Homes Above Shops in our Town Centres) supports the use of upper floors above shops for residential use where the vitality of the town centre is not thereby threatened.</p> <ul style="list-style-type: none"> • There is no need to repeat or depart from this policy, but it is worth noting that it implicitly supports the provision of flats, which are relatively well supplied already in the NA. <p>HC3 (Self-build and Custom Build Housing Provision) supports this mode of delivery, requires that 2% of plots on strategic allocated sites are reserved for it, and sets out a number of requirements for their design and associated infrastructure.</p> <p>DHC4 (Community-led Housing) supports this mode of delivery.</p> <ul style="list-style-type: none"> • The self-, custom and community housing element of AP4 as currently drafted adds useful nuance to HC3 and DHC4 by specifying the size of developments on which some provision of self- and custom-build housing will be required. It is not considered repetitive of Local Plan policy. <p>HC4 (Local Housing Need (Exception Sites)) allows for sites specifically allocated to bring forward affordable housing when well-related to existing settlements and facilities, where local need is clearly evidenced, and where that need cannot be readily met elsewhere in the locality.</p> <ul style="list-style-type: none"> • This policy permits the Neighbourhood Plan to allocate an exception site in response to the acute need for affordable housing identified in the HNA. It is not necessary for the next iteration of AP4 to announce support for exception sites at neighborhood level, as this would be repetitive.
<p>Effectiveness of policy</p>	<p>As currently drafted, the policy is clearly stated but some criteria lack specificity and, as such, may be difficult to implement effectively.</p> <p>The phrases 'add to the range and type of stock', and 'a good range of dwelling types' are relatively vague. They would be more effective if what constitutes 'a good range' were explicitly defined – either descriptively or in the form of a quantified target dwelling mix.</p> <p>Although it can be assumed that the tenure of housing is covered in the policy by these references to 'range' and 'type', it could be made more explicit if that is what is intended.</p> <p>The use of the phrase 'any schemes shall provide' has less force than the alternative 'all schemes shall provide'.</p> <p>The first paragraph in the policy could be made more effective by stating the general principles or overall aim that all criteria support. As currently drafted it effectively repeats the first and fourth criteria but does not encompass the second or third.</p> <p>Of the policy's four criteria, the third and fourth appear to be missing the bullet points that help to distinguish the first and second clearly as independent criteria. As a result, it may also appear to the reader that the final stipulation about the flood plain is also an (un-bulleted) criterion, which, in AECOM's</p>

	<p>reading, it is not. Though a planning officer would be able to understand it with careful attention, the policy could be made more immediately clear through this small formatting improvement and greater consistency of punctuation at the end of each criterion.</p> <p>Although the policy explanation states that ‘proposals for residential development will need to show how [the aim for outdoor space] can be met’, it would be useful to state how the feasibility of outdoor space is defined and under what conditions its absence can be accepted.</p> <p>The criteria relating to the provision of ground floor access, self, custom and cooperative housing, and the location of development outside of the floodplain are effectively drafted and in conformity with Local Plan policy.</p>
<p>Conformity check</p>	<p>Policy AP4 as worded has already been found by a Neighbourhood Plan Examiner to meet the Basic Conditions of Neighbourhood Planning and therefore is in conformity with then-applicable local and national policy. It remains in conformity with the 2019 NPPF.</p>
<p>Conclusion and recommendations</p>	<p>While the broad scope of the policy is worth retaining in its next iteration, there is also great potential to add depth and specificity to ensure that its objectives are achieved as effectively as possible.</p> <p>This is most apparent for the criterion relating to the desired range of housing, which is currently repetitive of Local Plan policy and potentially redundant. This criterion could be expanded to address a number of clearly defined aspects with evidenced policy requirements.</p> <p>The new HNA evidence provides ample justification to ensure that the new policy, and this criterion in particular, is more ambitious in various ways:</p> <ul style="list-style-type: none"> • addressing more explicitly the topic of tenure and affordability, by stating or referencing the scale of need for affordable housing, and encouraging development that maximises its provision; • defining the target balance within affordable housing between affordable rented tenures and affordable home ownership products; • specifying whether the appropriate range of housing types and sizes in Stroud is one that is diverse in and of itself, or one that addresses imbalances as compared with the wider district; • citing the target mix of dwelling sizes the HNA identifies as best positioned to serve the evolving needs of the population (allowing for a large degree of flexibility); • going beyond the Local Plan’s declaration of support for housing that meets the needs of older people by requiring that new development meets defined accessibility and adaptability standards; and • promoting the delivery of specialist housing for older people and those with support needs. <p>The HNA evidence with regard to the challenge of housing affordability may also be cited in design policies relating to the energy efficiency of buildings, since reducing fuel bills could improve housing access for those on lower incomes in particular.</p> <p>The policy criteria pertaining to a) outdoor space, b) ground level access, c) self-, custom and cooperative housing, and d) development outside of the floodplain, are effective as drafted. These do not require additional evidence, or require refinement on the basis of the HNA findings. That said, the policy explanation could benefit from more detail on the feasibility of providing outdoor space and how it should be provided in practice.</p> <p>Depending on how far the neighbourhood planners wish to evolve and expand AP4 in its next iteration, it may be clearer to divide it into a number of separate policies, as is typical in many other neighbourhood plans. If the current approach of a single policy is preferred, careful attention should be paid to formatting, punctuation, and the function of its first paragraph in order to aid comprehension.</p>

<p>Policy name and number</p>	<p>AP9a Design- General Principles.</p>
<p>AECOM understanding of policy intent</p>	<p>The policy seeks to ensure that design respects the cultural and environmental heritage of the town’s buildings and character, emphasizing design principles that are environmentally sound. This covers construction materials, plant and animal habitat creation, conservation of energy, sustainable drainage, use of renewable energy sources and accessibility. It seems logical and rational for the next iteration of the policy to carry these basic elements forward. Focussing specifically on how the existing policy might respond effectively to the climate emergency declaration, it consists of eight bullet points, five of which already directly address environmental sustainability, so is reasonably strong in this regard already (though with potential for further strengthening).</p>
<p>Evidence source and type</p>	<p>The adopted Neighbourhood Plan identifies the design checklist in the submission Local Plan as the specific evidence source for ‘this policy’ (sic)- more accurate would be to state that the design checklist informs only Policy AP9a, as AP9b relates to the Public Realm Strategy (or its refresh) rather than the design checklist.</p>
<p>Evidence analysis²⁹</p>	<p>The environmental components of the evidence relate well to national legislation and/or non-statutory technical standards and also align well with Stroud District’s emerging local objectives. Since the original Neighbourhood Plan was made, the intervening declaration of a climate emergency at District and Town levels should be cited as part of the evidence base underpinning the policy and appropriately referenced in supporting text.</p> <p>At the time of writing, Stroud’s Draft Local Plan (2019) forms, for the purposes of neighbourhood planning, evidence rather than policy. It has several policies that align well with and are particularly relevant to AP9a which could therefore be referenced within and inform/or the supporting and/or policy text of its next iteration, as follows:</p> <ul style="list-style-type: none"> • DCP1 (Delivering Carbon Neutral by 2030) identifies Stroud District will be carbon neutral by 2030, and replacement policy AP9a will have a key role to play in delivering this target. The replacement policy text needs to reference this target and state explicitly that the design of new development is a fundamental consideration in terms of achieving carbon neutrality; • CP8 (New Housing Development) states that new development should integrate with the character of existing development and that all building use sustainable construction techniques; • CP14 (High Quality Sustainable Development) focuses on integrating design guidelines that minimize energy use and maximize renewable energy production; • ES1 (Sustainable Construction and Design), which seeks to reduce the potential for development overheating (not currently within AP9a, but relevant and could be added- see also Proportionality and Gaps section below); • ES4 (Water Resources, Quality and Flood Risk) is strong on defining sustainable urban drainage in a way that could add clarity and detail to AP9a’s own treatment of the issue; • ES6 (Providing for Biodiversity and Geodiversity) states that development proposals must provide net gain for biodiversity; there is definite potential to require ‘net gain’ in the new policy and expand on its meaning in the supporting text; <p>The supporting text quotes the 2012 NPPF as evidence (but this has now been superseded by the 2019 NPPF), so needs updating to state that ‘<i>Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities</i>’ (paragraph 124).’</p>

²⁹ See footnote 11 of this report for an explanation of why the emerging Local Plan is assessed under this heading rather than that of Policy Conformity.

	<p>Further evidence that could effectively support a replacement policy AP9a is set out in Appendix 3: Resources for neighbourhood planning in a climate emergency.</p> <p>Reference could be made in the supporting/justification text to Appendix 4, which references the consultation carried out demonstrating the green spaces and wildlife were high on the list of what respondents felt were the things that most needed to change to improve Stroud. In addition, in September 2019 Stroud became the world's first Earth Protector Town, this could also be referenced, because the goals these towns should meet, as being tested in practice through the ongoing pilot programme, can be used as evidence for increasing the environmental content and requirements of AP9a.</p>
<p>Proportionality and gaps</p>	<p>Building emissions made up 34% of UK greenhouse gas emissions in 2014³⁰, therefore policies that support building design that can reduce emissions are justified and proportionate. However, it is unclear what is meant by 'external lighting using renewable sources.' It is not clear if this includes publicly-owned light sources (e.g. street lamps) or not. If so, then it is possible that the District Council could ensure renewable energy is used, but this is outside the scope/power of a neighbourhood plan. As such, the wording could be tightened here to make it clear that it is referring to external lighting that is under the control of the developer/landowner. While this would be provided by a grid connection, it is unlikely that the electricity provided can be guaranteed to be provided by renewables given the mix of energy sources in the national grid, unless on-site renewable generation is required for all new development (see review of policy AP13). However, even without on-site power generation, it is possible to require that energy providers for all new developments guarantee 100% renewable tariffs.</p> <p>Existing policy gaps that have potential to be addressed through the next iteration of AP9a are as follows:</p> <ul style="list-style-type: none">• explicitly referencing the requirement to maximise net gain in biodiversity as part of bullet 3, and as required by the emerging Local Plan (because it is not yet adopted, restatement of emerging policy is less of an issue- and net gain is not an adopted policy requirement). In the 2019 NPPF, paragraph 170 d) is supportive evidence;• Appropriate design responses to the climate emergency that are not currently mentioned in AP9a, but could be, include siting and orienting development to maximise passive solar gain for heating (this could be added to bullet 4, or as a new bullet- in terms of evidence source, 2019 NPPF, paragraphs 150 b) and 153 b) are supportive);• Require adequate and appropriate space for recycling and composting of waste in new development, either as an extension of bullet 4 or as a new bullet;• ensuring thermal efficiency and environmental sustainability in use of building materials (possibly referencing natural materials such as earth and straw that perform well in this regard- again, as an addition to bullet 4 or as a new bullet);• requiring native planting and/or fruit and nut trees, as the former maximises biodiversity gains and the latter helps reduce food miles (to be added to bullet 7 or as a new bullet);• as a new bullet, or as an adaption to bullet 7, refer to the need for development to minimise its contribution to any urban heat island effect and/or to adapt to climate change by minimising the risk of internal overheating- Public Health England's 'Heatwave Plan for England' highlights a role for green infrastructure in this regard³¹;• Add further specificity to bullet 7 by explicitly mentioning green walls, and/or green roofs- while it is recognised that these may not be mentioned as there would otherwise be overlap with Statement NP4, in fact, a cross-reference to NP4 within the policy itself³² would likely enhance policy effectiveness, and 'living green walls' are also referenced in the Plan vision;

³⁰ See, for example,; <https://www.theccc.org.uk/wp-content/uploads/2014/08/Fact-sheet-buildings-updated-July-2015.pdf>

³¹ Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/801539/Heatwave_plan_for_England_2019.pdf

³² There is already a cross-reference to NP4 in the Explanation text, although it incorrectly refers to Policy NP4, rather than Statement NP4.

	<ul style="list-style-type: none">• As a final point, recognising that the above requirements will need to be balanced appropriately against heritage considerations given the extent of conservation areas and the number of listed buildings in the Plan area.
Effectiveness of policy	<p>There is potential for some policy requirements (e.g. habitat provision, sustainable drainage, trees and natural planting) to be worded as more strictly integral to/holistic within the design of the development as otherwise there is a risk that they might be provided alongside and/or appear as a token afterthought to development, while still technically according with the policy.</p> <p>There are five additional ways to enhance the effectiveness not only of AP9a but also all other plan policies in the context of the climate emergency declaration, as follows:</p> <p>Firstly, as this EBPD report itself has had to do (see Chapter 1), it would be helpful to spell out to Plan users exactly what the climate emergency declaration means for the Neighbourhood Plan and how it will be reflected in and shape all policies.</p> <p>Secondly, the Plan's overall vision (welcoming, healthy and thriving) needs to be refreshed to put climate change mitigation, adaptation and environmental sustainability centre stage. At the moment, these objectives are not explicitly addressed in the vision at all and only one bullet point out of thirteen ('greening the town centre and environs') has direct relevance to them.</p> <p>Thirdly, performance in terms of climate change mitigation and adaptation needs to be added as a Monitoring topic in Table 2 (page 87). As climate change mitigation and adaptation are such complex areas, and as action is now so urgent, monitoring policy effectiveness on these topics is crucial if the Neighbourhood Plan is to make a credible, tangible difference and if policies are to have their intended effect. Surprisingly, the District Council, which also has an important role to play in the monitoring not only of neighbourhood plan policies but also of course Local Plan policies, also does not reference environmental sustainability or climate change on its own monitoring page at present (only monitoring housing and employment land)³³, which is an unexpected omission given its own climate emergency declaration.</p> <p>Fourthly, if the refreshed Neighbourhood Plan is to focus more clearly on environmental sustainability, it would be helpful to add a glossary of technical terms- not just to aid comprehension by non-specialists but also to clarify what the Plan means when it refers to individual concepts that could be ambiguous. For example, 'sustainable drainage system' can mean anything from an underground tank to a multi-functional green space that can absorb heat and carbon through native planting. Clearly, in a climate emergency, it is the latter definition that would be preferable for the Neighbourhood Plan to stipulate.</p> <p>Fifthly, the Plan's overall effectiveness would likely be enhanced if, as part of its planned refresh, there was added clarity and consistency in its internal structure. This means showing more clearly how the overall Vision (page 7) and then the themes and objectives flowing from that Vision (page 29) flow through to the objectives specific to each policy (in the case of AP9a and AP9b, these Objectives are on page 44) and then into the policies themselves. One thing that would help would be if the Vision and the strategic objectives that flow from it were on subsequent pages (currently, there are twenty-two pages between them, which hampers the Plan user's ability to see clearly how the Vision informs the Objectives).</p> <p>In terms of AP9a and AP9b specifically, two of the three objectives on Page 44 flow from Theme 4 (Enhancing the Environment of the Town Centre) and one from Theme 1 (Sustaining the Economy of the Town Centre). While this consistency is welcome and enhances effectiveness, it would be helpful if there was explanation somewhere in the Plan that the page 29 Strategic Objectives flow, and are intended to flow, through to the policy-</p>

³³ See <https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/monitoring>

	<p>specific objectives and then into policies. It is also not clear why there are only three objectives in the case of Policy AP9a and AP9b, because there are others that are also relevant; referring back to page 29, other objectives that could/should be listed on page 44 as relevant to AP9a specifically (in whole or in part³⁴) include <i>‘Respect the setting of the town centre by protecting important views’, ‘provide a good range of high-quality accommodation, in which businesses, including social and cultural enterprises, can establish and grow’</i> and <i>‘provide more high-quality dwellings to increase the number and range of people who live in the Town Centre’</i>.</p>
<p>Conformity check</p>	<p>Policy AP9a as worded has already been found by a Neighbourhood Plan Examiner to meet the Basic Conditions of Neighbourhood Planning and therefore is in conformity with then-applicable local and national policy. It remains in conformity with the 2019 NPPF.</p> <p>The replacement policy, for the reasons described in the main body of the report, will to some extent, form a test case of the extent to which it is possible to respond to a Climate Emergency declaration and/or achieve short-to-medium term achievement of carbon neutrality within the significant constraints of existing national policy and considerations of development viability. However, in the case of AP9a, it is considered that significant policy strengthening could be achieved through implementing the recommendations in this Appendix without unsurmountable impacts on development viability.</p>
<p>Conclusion and recommendations</p>	<p>It seems logical and rational for the next iteration of the policy to carry its existing basic elements forward, suitably strengthened and with detail added. The environmental components of the evidence relate well to national legislation and/or non-statutory technical standards and also align well with Stroud District’s emerging local objectives.</p> <p>Since the original Neighbourhood Plan was made, the intervening declaration of a climate emergency at District and Town levels should be cited as part of the evidence base underpinning the policy and appropriately referenced in supporting text. At the time of writing, Stroud’s Draft Local Plan (2019) forms, for the purposes of neighbourhood planning, evidence rather than policy. It has several policies that align well with and are particularly relevant to AP9a which could therefore be referenced within and inform/or the supporting and/or policy text of its next iteration. Further evidence that could effectively support a replacement policy AP9a is set out in Appendix 3: Resources for neighbourhood planning in a climate emergency.</p> <p>Clarification on the definition of external lighting would be helpful. Existing policy gaps that have potential to be addressed through the next iteration of AP9a include: maximising net gains in biodiversity; siting and orienting development to maximise passive solar gain; requiring adequate and appropriate space for recycling and composting of waste; ensuring thermal efficiency and environmental sustainability in building materials; requiring native planting and/or fruit and nut trees; minimising urban heat island effects and/or internal overheating; and mention of green walls and/or green roofs.</p> <p>There is potential for some policy requirements to be worded as more strictly integral to/holistic within the design of the development as otherwise there is a risk that they might be provided alongside and/or appear as a token afterthought to development, while still technically according with the policy.</p> <p>There are five additional ways to enhance the effectiveness not only of AP9a but also all other plan policies in the context of the climate emergency declaration, as follows:</p> <ul style="list-style-type: none"> • Spell out to Plan users exactly what the climate emergency declaration means for the Neighbourhood Plan;

³⁴ On the reasonable assumption that it is better for policies to quote and be clearly informed by part of a strategic objective, which helps demonstrate the fact that the Plan is a coherent entity, than not quote it at all. In this case, the references to ‘high-quality accommodation’ for businesses and ‘high-quality dwellings’ are considered to be relevant to design policy.

- Refresh the Plan's overall vision (welcoming, healthy and thriving) to put climate change mitigation, adaptation and environmental sustainability centre stage.
- Add performance in terms of climate change mitigation and adaptation as a Monitoring topic in Table 2;
- Add a glossary of technical terms- not just to aid comprehension but also to clarify what the Plan means when it refers to individual concepts that could be ambiguous; and
- Add clarity and consistency to the Plan's internal structure (i.e. a clearer, more intuitive flow from vision to strategic objectives, to policy objectives, to policies. In terms of AP9a and AP9b specifically, there are more strategic objectives that could/should flow through to form policy objectives.

It is considered that in the case of AP9a, significant policy strengthening could be achieved through implementing the recommendations in this Appendix without unsurmountable impacts on development viability.

In formulating revisions to AP9a, the recommendations of this EBPD should be taken into account alongside the extensive consideration of Plan—area wide design principles within, and relevant conclusions from, AECOM's separate but complementary Design Guidelines report.

Policy name and number	AP9b – Design- Public Realm
AECOM understanding of policy intent	The intent of AP9b is to ensure that future development of Stroud’s public realm shall follow the guidelines of the Public Realm Design Principles. These guidelines put focus on the ground surfaces of Stroud’s main street types, with requirements to support street furniture, cycle racks, seats and benches, litter bins, bollards, planting, signage, lighting, and public art.
Evidence source and type	The policy rests on the Stroud Town Centre Public Realm Strategy (2009) ³⁵ , but acknowledges in the explanation text that not all of its proposals are now relevant, so for clarity those parts of the strategy which relate to AP9b are set out in Appendix 6 of the Neighbourhood Plan; explanatory text states that Appendix 6 should be kept under review to ensure it remains up to date. AECOM’s separate Design Guidelines report effectively functions as a refresh of the Public Realm Strategy.
Evidence analysis	<p>The relevant parts of the Public Realm Strategy that are cited in Appendix 6 comprise guidelines on ground surfaces, furniture, cycle racks, seats and benches, litter bins, bollards, planting, signage, lighting and public art.</p> <p>The guidance in Appendix 6 does not relate particularly strongly to environmental sustainability or climate change adaptation or mitigation and therefore has great potential for being expanded and updated- see text in Proportionality and Gaps and Effectiveness of Policy below. The existing text that has greatest potential to act at cross-purposes to the climate agenda is the general presumption against introducing lines of trees into historic areas where none have existed previously. The Town Council should consider if the balancing of priorities (here, heritage versus climate emergency) might indicate that greater encouragement for tree planting may be justified. The Public Realm Strategy does not provide any further explanation of what it means by ‘historic areas’, or whether individual trees would be supported (as opposed to ‘lines’) in these locations. Indeed, elsewhere in the Public Realm Strategy, it is stated (page 112) that <i>‘trees contribute significantly to the character and quality of the townscape, most notably those around the church and Bank Gardens, but also the few isolated trees elsewhere.’</i></p> <p>It would also be appropriate to add a reference to Appendix 4 in the supporting text, given that two of the top three things respondents say they don’t like about Stroud relate to the public realm. Moreover, Stroud’s status as the world’s first Earth Protector Town could also be referenced, because the goals these towns should meet, as being tested in practice through the ongoing pilot programme, can be used as evidence for increasing the environmental content and requirements of AP9b.</p> <p>At the time of writing, Stroud’s Draft Local Plan (2019) forms, for the purposes of neighbourhood planning, evidence rather than policy. It has several policies that align well with and are particularly relevant to AP9b which could therefore be referenced within and inform/or the supporting and/or policy text of its next iteration, as follows:</p> <ul style="list-style-type: none"> • DCP1 (Delivering Carbon Neutral by 2030) identifies Stroud District will be carbon neutral by 2030, and replacement policy AP9a will have a key role to play in delivering this target. It should also be designed to maximise green infrastructure to sequester carbon and to support local food production; • CP4 (Place Making), which requires developments to create a place with a locally-inspired or distinctive character (whether historic, traditional or contemporary) using appropriate materials, textures, colours and locally-distinctive architectural styles; protecting or enhancing local biodiversity; create safe streets where buildings are positioned with landscaping to define and enhance streets and spaces; assist finding your way around with focal points or landmarks; provide permeability, reduce car domination of the street and reduce vehicle speeds; provide shared or social spaces on the streets (where

³⁵ Available at https://www.stroud.gov.uk/media/1670/stroud_public_realm_strategy.pdf

	<p>appropriate); create safe well managed attractive public and private amenity spaces; and provide adequate external storage space for waste bins, recycling materials and bicycle storage.</p> <ul style="list-style-type: none">• CP14 (High Quality Sustainable Development), which seeks the provision of SuDS, no increased risk of flooding on or off development sites, an appropriate design and appearance respectful of the surroundings, demonstrating the relationship to green infrastructure on site and wider networks, and safe, convenient and attractive accesses on foot and by cycle and suitable connections with existing footways, bridleway, cycleways, local facilities and public transport;• ES6 (Providing for Biodiversity and Geodiversity) states that development proposals must provide net gain for biodiversity;• ES8 (Trees, Hedgerows and Woodlands), which states that development should seek where appropriate to enhance and expand the District's tree and woodland resource. Development proposals shall provide soft landscaping details, including tree and wood planting where appropriate. Landscaping schemes should take account of ecological interests (including green infrastructure networks) and should include the planting of indigenous species where appropriate. The Council will seek long-term maintenance and management plans to accompany the soft landscaping proposals where appropriate.• DES2 (Green Infrastructure), which states that all development proposals should, where possible, and appropriate to their nature and scale: increase the functionality of existing and planned green infrastructure, especially where this helps to mitigate the causes of and addresses the impacts of climate change; improve the quality of existing green infrastructure, including local networks and corridors, specifically to increase its attractiveness as a recreation opportunity and its value as a habitat for biodiversity; protect and improve access to and connectivity between existing and planned green infrastructure to develop a continuous right of way and greenway network and integrated ecological system/network; secure new green infrastructure in order to cater for anticipated increases in demand arising from development particularly in areas where there are existing deficiencies assessed against standard contained within this Plan; and provide long-term management arrangements for new and enhanced green infrastructure within development sites.• ES1 (Sustainable Construction and Design), which requires all new developments to provide covered and secure cycle parking facilities (HQM or equivalent) in accordance with Local Plan standards• ES16 (Public Art Contributions), which requires proportionate contributions to public art for larger developments and encourages the inclusion of public art for smaller schemes.
<p>Proportionality and gaps</p>	<p>The existing definition of what constitutes public realm for the purposes of AP9b is narrow, and this could be considered a gap. Apart from planting, it focuses mainly on 'hard' landscaping. However, there are many 'softer' landscape elements that not only could be considered part of the public realm already but also should be included if the policy is to respond better to the climate emergency in future.</p> <p>It was noted in the review of AP9a above that a Plan-wide glossary to define key terms would be helpful, and AP9b is another example. In planning generally, there is an undefined, 'fuzzy' overlap between public realm and green infrastructure (although the latter term does not appear in the adopted Neighbourhood Plan). Effectively, any publicly-accessible green infrastructure, such as Local Green Spaces or Amenity Spaces with footpaths across them, or community orchards, external SuDS also form part of the public realm and should therefore not only be incorporated into an updated Appendix 6 but also should be defined as part of the public realm in a new Plan-wide glossary.³⁶</p> <p>Existing policy gaps that have potential to be addressed through the next iteration of AP9b (either in the policy itself or in Appendix 6, as appropriate) are as follows:</p>

³⁶ Since the adoption of the Neighbourhood Plan, Stroud District has produced an updated suite of Open Space and Green Infrastructure Study reports, which should be used to inform the revised Neighbourhood Plan's approach to green infrastructure. They are available at <https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/evidence-base/environmental-evidence/green-infrastructure-sport-and-recreation-study>.

	<ul style="list-style-type: none"> • More explicit encouragement of, and references to, cycling infrastructure in the public realm over and above just cycle racks- for example, support for and guidance on clearly marked new cycle paths. Cycle racks themselves should be required to be located, where possible, closer to building entrances than car parking to implicitly promote modal shift toward cycling- such measures should be cross-referenced to Statement NP4, which requires the greening of footpaths and cycleways where appropriate, Statement NP6 on cycle access and Policy AP3 on access and movement; • More explicit encouragement of, and references to, walking in the public realm over and above just signage, for example seeking a coherent, permeable walking network through public realm interventions, maximising the space available to pedestrians free from vehicles, increasing pedestrian crossing sizes and timings to help encourage older people to walk, and so on; • Reference to and guidance on the size, form and location of electric vehicle charging points, which by necessity form features of the public realm; • Greater clarity on and promotion of (ideally native, and food-producing) tree planting and tree cover as a vital component of the public realm (this is a good example of the overlap between public realm and green infrastructure), in particular considering whether in a climate emergency the balance of evidence (heritage versus climate change mitigation/resilience) continues to support the presumption against tree planting in certain locations in the existing Appendix 6 text; • Consideration of climate change adaptation measures (alongside mitigation measures) in the public realm- these might include, for example, introducing more permeable surfaces in locations particularly susceptible to surface water flooding, avoiding new impermeable hard-standing to reduce flood risk, introducing materials and features that may reduce the urban heat island effect and/or overheating, such as green walls and roofs (appropriately cross-referenced to, or incorporating, Statement NP4³⁷), and so on; • Referencing the potential for, and setting appropriate requirements for, climate-friendly external drainage features, such as (multi-functional) SuDS, soakaways, ponds, rills and so on, to make a positive contribution to the public realm • If extending the definition of the public realm to green infrastructure and/or accessible open space, ensuring the policy seeks a) its retention, enhancement and expansion, b) ecologically-friendly maintenance techniques, such as reducing mowing frequencies to encourage wild flowers and shrub layers, and c) net biodiversity gain, as also potentially referenced in any replacement policy AP9a; • As a final point, recognising that the above requirements will need to be balanced appropriately against heritage considerations given the extent of conservation areas and the number of listed buildings in the Plan area.
<p>Effectiveness of policy</p>	<p>As already noted to some extent in the Proportionality and Gaps text above, the effectiveness of a replacement AP9b that takes into account the changes needed in the public realm (including possibly expanding its definition) to respond to the climate emergency would be enhanced by cross-referencing it to other relevant policies and statements (including, but not necessarily limited to, NP4 and AP13) to help justify the consideration of climate-friendly measures affecting the public realm such as green roofs and walls, and electric car charging points (the latter is increasingly strongly supported in national evidence and policy- for example, in the Government’s Clean Growth Strategy³⁸).</p> <p>The general review of existing Appendix 6 text to ensure it is up-to-date and reflects existing best practice, as correctly recognised by the Explanation text on page 45 of the adopted Plan, would certainly enhance policy effectiveness. In this regard, an excellent example that could inform policy revision (for the harder landscaping elements, at least) is the City of London’s recent ‘City Cluster Vision’³⁹. The Vision examines why public realm is needed and how current uses can be adapted to better align with the needs of the population today and in the future. It has identified 10 indicators of what makes streets attractive: ‘easy to cross’, ‘shade and shelter’, ‘places to stop and rest’, ‘not too noisy’, ‘sustainable transport modes’ (walking, cycling and public transport), ‘people feel safe’, ‘things to see and do’, ‘people feel relaxed’, ‘clean air’, and ‘pedestrians from all walks of life’. While it is acknowledged that the City of London and Stroud town centre are very different places, there are commonalities, such as the need for public realm enhancements to have appropriate regard to listed buildings and conservation areas.</p>

³⁷ As currently worded, Statement NP4 relates entirely to the public realm and therefore there is a strong case for incorporating it within any expanded and more effective Policy AP9b.

³⁸ Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/700496/clean-growth-strategy-correction-april-2018.pdf

³⁹ Available at <https://www.cityoflondon.gov.uk/services/environment-and-planning/city-public-realm/Documents/city-cluster-vision.pdf>

Conformity check	<p>Policy AP9b as worded has already been found by a Neighbourhood Plan Examiner to meet the Basic Conditions of Neighbourhood Planning and therefore is in conformity with then-applicable local and national policy. It remains in conformity with the 2019 NPPF.</p> <p>The replacement policy, for the reasons described in the main body of the report, will to some extent, form a test case of the extent to which it is possible to respond to a Climate Emergency declaration and/or achieve short-to-medium term achievement of carbon neutrality within the significant constraints of existing national policy and considerations of development viability. However, in the case of AP9b, it is considered that significant policy strengthening could be achieved through implementing the recommendations in this Appendix without unsurmountable impacts on development viability.</p>
Conclusion and recommendations	<p>The guidance in Appendix 6 does not relate particularly strongly to environmental sustainability or climate change adaptation or mitigation and therefore has great potential for being expanded and updated. In so doing, the Town Council should consider in particular if the balancing of priorities (here, heritage versus climate emergency) might indicate that greater encouragement for tree planting may be justified.</p> <p>The existing definition of Public Realm for the purposes of AP9b is narrow, and this could be considered a current gap. Apart from planting, it focuses mainly on 'hard' landscaping. However, there are many 'softer' landscape elements that not only could be considered part of the public realm already but also should be included if the policy is to respond better to the climate emergency in future.</p> <p>Existing policy gaps that have potential to be addressed through the next iteration of AP9b (either in the policy itself or in Appendix 6, as appropriate) are as follows:</p> <ul style="list-style-type: none">• More explicit encouragement of, and references to, cycling infrastructure in the public realm;• More explicit encouragement of, and references to, walking in the public realm;• Reference to and guidance on the size, form and location of electric vehicle charging points;• Greater clarity on and promotion of (ideally native, and food-producing) tree planting and tree cover as a vital component of the public realm;• Consideration of climate change adaptation measures (alongside mitigation measures) in the public realm;• Referencing the potential for, and setting appropriate requirements for, climate-friendly external drainage features;• For those parts of the public realm that could also be defined as green infrastructure, ensuring the policy seeks a) its retention, enhancement and expansion, b) ecologically-friendly maintenance techniques and c) net biodiversity gain;• Recognising that the above requirements will need to be balanced appropriately against heritage considerations. <p>An excellent example of up-to-date best practice public realm planning that could be taken into account for the harder landscaping elements of Policy AP9b is the City of London's recent 'City Cluster' report.</p> <p>It is considered that significant policy strengthening could be achieved through implementing the recommendations in this Appendix without unsurmountable impacts on development viability.</p> <p>In formulating revisions to AP9b, the recommendations of this EBPD should be taken into account alongside the extensive consideration of public realm within, and the relevant conclusions from, AECOM's separate but complementary Design Guidelines report.</p>

Policy name and number	AP13 Energy
AECOM understanding of policy intent	The policy aims to increase energy efficiency of existing and new developments, promote community based renewable energy generation; and encourage low-emission transportation which will be supported with the provision of plug in facilities for electric vehicles (EVs) and electric bicycle batteries.
Evidence source and type	The only evidence cited is in the Explanation text, which references the policies in the Local Plan but also the 2012 NPPF, which states ' <i>development should be located and designed where practical to incorporate facilities for charging plug-in and other low-emission vehicles</i> '.
Evidence analysis	<p>The environmental components of the evidence relate well to national legislation and/or non-statutory technical standards and also align well with Stroud District's emerging local objectives. Since the original Neighbourhood Plan was made, the intervening declaration of a climate emergency at District and Town levels should be cited as part of the evidence base underpinning the policy and appropriately referenced in supporting text.</p> <p>At the time of writing, Stroud's Draft Local Plan (2019) forms, for the purposes of neighbourhood planning, evidence rather than policy. It has several policies that align well with and are particularly relevant to AP9a which could therefore be referenced within and inform/or the supporting and/or policy text of its next iteration, as follows:</p> <ul style="list-style-type: none"> • DCP1 (Delivering Carbon Neutral by 2030) identifies Stroud District will be carbon neutral by 2030, and replacement policy AP13 will have a key role to play in delivering this target. The replacement policy text needs to reference this target and state explicitly that energy use in new development is a fundamental consideration in terms of achieving carbon neutrality; • CP8 (New Housing Development) which aims to provide renewable or low carbon energy sources in association with proposed residential developments; • CP11 (New Employment Development) which aims to provide renewable or low carbon energy sources in association with proposed employment developments • CP14 (High Quality Sustainable Development) requires measures to minimise energy use and maximise renewable energy production; • HC8 (Extensions to Dwellings) which seeks opportunities to enhance the energy efficiency of existing dwellings if and when they are extended; • ES1 (Sustainable Construction and Design), which requires all new development to achieve a net zero carbon standard by means of an overall minimum 35% reduction in emissions over Part L 2013 Building Regulations achieved onsite, and a minimum of 10% and 15% reduction in emissions over Part L 2013 Building Regulations achieved respectively in homes and in non-domestic developments through fabric energy efficiency improvements; • ES2 (Renewable or Low Carbon Energy Generation), which states that 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. This includes solar and wind, and particular support will be given to renewable and low carbon energy generation developments that are led by or meet the needs of local communities. <p>The reference to the 2012 NPPF needs to be replaced by the relevant 2019 NPPF text, namely 'applications for development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations' (paragraph 110e). There is also potential to cite as supporting evidence further 2019 NPPF text on low-carbon energy generation- see in particular paragraphs 148, 151 and 152.</p>
Proportionality and gaps	AP13 seeks low and zero-carbon energy generation in a way that was proportionate in the context of the 2012 NPPF, but the 2019 NPPF is more exacting in terms of renewable and low-carbon energy and the policy needs to be updated accordingly (see Effectiveness of Policy below for further details).

On low emission vehicle charging facilities, the policy could set out specific requirements. For example, instead of stating 'charging facilities for plug in vehicles should be provided where practical', a minimum percentage should be required. This is the approach in the draft Stroud Local Plan, whose requirements are much stronger and consideration more detailed, as follows:

- *'Every new residential building with an associated car parking space will have a charge point. This also applies to buildings undergoing a material change of use to create a dwelling;*
- *Every residential building undergoing major renovation with more than 10 car parking spaces to have cable routes for electric vehicle charge points in every car parking space;*
- *Every new non-residential building including buildings undergoing major renovation with more than 10 car parking spaces to have one charge point and cable routes for an electric vehicle charge point for one in five spaces; and*
- *Every existing non-residential building with more than 20 car parking spaces should have at least one charge point from 2025.*

To be classified as a charge point for the purpose of policy compliance, each charge point must be a minimum 7kW and be at least Mode 3 or equivalent. It is recognised that innovations are coming to market that use different types of chargers and charging speeds, such as wireless and ultra-rapid charging, although these are unlikely to be used in residential settings. Policy specifically allows for equivalence with Mode 3 charge points to allow for future innovation to not be excluded where it provides an equal or better facility.'

On local renewable energy generation - as the policy stands, giving support to renewable energy in principle with no further detail has now become a simple restatement of national policy. As such, significant further, locally specific detail and evidence is needed, such as, for example:

- Requiring stringent minimum energy efficiency standards (for both residential and non-residential development), in line with and to support the delivery of Policy DCP1 in the draft Local Plan review (recognising that restatement is less of an issue at present given than DCP1 is not yet adopted); also, noting that Policy SI2 of the Intend to Publish version of the London Plan⁴⁰, which is close to adoption at the time of writing, likewise requires at least 35% on-site reduction in greenhouse gas emissions beyond Building Regulations for major development, with residential development achieving 10% and non-residential 15%;
- Seeking opportunities to retrofit renewable energy generation to existing development when there is the opportunity to do so through planning permissions, in a similar way to draft Local Plan Review policy HC8;
- Recognising the importance of the policy cycle, in other words, setting AP13 in the context of the wider process to reduce carbon emissions. This means, firstly, using the carbon audit planned by the Town Council referenced in the Climate Change Resolution⁴¹ as baseline evidence, and then, having significantly strengthened policy text and adopting the Plan, monitoring policy implementation via planning permissions in order to measure the emissions reductions that it is achieving relative to the baseline audit.
- While the policy promotes and encourages community-based renewable energy generation, it is not clear from the adopted Plan whether or not community-owned or led renewables projects have ever been trialled in, or are feasible in, the town centre. Clarity on this point in the supporting text, including any activity in this regard since Neighbourhood Plan adoption, would be helpful. Even if they have been trialled/researched and found not to be feasible for any reason, it would be good to state this for the avoidance of doubt and to enable lessons to be learnt.
- Specific infrastructure and/or specific locations suitable for its installation should be mentioned, what the criteria for support would be (if relevant), and how it might be funded, for example through developer contributions. Some examples include: rooftop solar (which normally is outside the scope of statutory plans as it does not need planning permission, but this is not the case in conservation areas, where it could be grated subject to heritage

⁴⁰ Greater London Authority, December 2019; available at https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf

⁴¹ See <https://stroudtown.gov.uk/2019/10/02/climate-change-resolution-2/>

	<p>constraints); micro hydro schemes, which have potential to make use of the River Frome as it flows through the Plan area; heat pumps; biomass heating; and so on.⁴²</p> <ul style="list-style-type: none"> • Mentioning the potential or otherwise for a district heating scheme, which is, like electric vehicles, identified by the Government’s Clean Growth Strategy as a key measure to reduce carbon emissions⁴³. It is not clear from the adopted Plan whether or not a district heating scheme would be viable or feasible in the town centre, but more recently Stroud District’s Renewable Energy Resources Assessment uses heat mapping to demonstrate that it is likely the most appropriate location in the District to do so, and this should be referenced and considered in policy revision. • Requiring a carbon reduction plan to be submitted as part of a development application for ease of reference by Council officers when determining applications for development- forming a single, at-a-glance summary of the various methods or means by which developments might be able to reduce emission • As a final point, recognising that the above requirements will need to be balanced appropriately with their potential impact on statutorily-protected heritage assets, given the extent of conservation areas and the number of listed buildings in the Plan area.
<p>Effectiveness of policy</p>	<p>The policy consists of three sentences in a single paragraph, each seeking a separate objective (renewable energy generation, charging for low-emission vehicles and electric cycle charging). Its effectiveness would likely be enhanced if it were split into separate paragraphs or clauses, particularly given that the recommendations in this EBPD are likely to result in the text increasing in length in any case.</p> <p>As noted above, likely because of the 2012 NPPF pertaining at the time it was adopted, the adopted policy had to use relatively weak language (‘promoted’, ‘should be’, ‘encouraged’) which reduces its effectiveness. The 2019 NPPF, by contrast, justifies firmer text such as ‘should’, ‘require’ and so on- as do, to lesser extents, the emerging Local Plan and the climate emergency declarations (though the weight to be attached to the declarations is far more arguable in policy/statutory terms, hence the caveats in Chapter 1 of this report).</p> <p>The five neighbourhood-plan wide recommendations made in the effectiveness section of the review of Policy AP9a above would also, if implemented, have significant potential to enhance the effectiveness of policy AP13.</p> <p>AP13 is informed by a single objective (Page 49) which flows from Themes 4 and 5 (respectively, Enhancing the Environment of the Town Centre and Creating a Healthier Town Centre) on page 29. There are currently no other relevant objectives that could/should be listed on page 49, but if environmental sustainability is put centre stage in a refreshed Plan vision as recommended in our review of Policy AP9a, then it is expected that further strategic objectives relevant to the policy could be formulated and then quoted as a starting point for the policy text.</p>
<p>Conformity check</p>	<p>Policy AP13 as worded has already been found by a Neighbourhood Plan Examiner to meet the Basic Conditions of Neighbourhood Planning and therefore is in conformity with then-applicable local and national policy. It remains in conformity with the 2019 NPPF; while it goes further than the adopted Local Plan, this is justifiable given the rapid speed with which national policy on low-carbon and renewable energy has evolved.</p> <p>The replacement policy, for the reasons described in the main body of the report, will to some extent, form a test case of the extent to which it is possible to respond to a Climate Emergency declaration and/or achieve short-to-medium term achievement of carbon neutrality within the significant constraint of ensuring development remains viable. As such, while more restrictive wording is certainly justified in the current policy context, the Town Council should prepare for a degree of resistance from the development industry on viability grounds and have appropriate regard to sections 1.3.3 and 3.2 of this report when considering how it might be strengthened.</p>
<p>Conclusion and recommendations</p>	<p>The declaration of a climate emergency at District and Town levels should be cited as part of the evidence base underpinning the policy and appropriately referenced in supporting text.</p>

⁴² Stroud District’s Renewable Energy Resources Assessment, available at <https://www.cse.org.uk/downloads/reports-and-publications/planning/renewables/stroud-renewable-energy-assessment-2019.pdf>, highlights a potential role for the District Council in facilitating the identification, assessment and development of sites for renewable energy generation.

⁴³ See https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/700496/clean-growth-strategy-correction-april-2018.pdf

At the time of writing, Stroud's Draft Local Plan (2019) forms, for the purposes of neighbourhood planning, evidence rather than policy. It has several policies that align well with and are particularly relevant to AP9a which could therefore be referenced within and inform/or the supporting and/or policy text of its next iteration.

The reference to the 2012 NPPF needs to be replaced by the relevant 2019 NPPF text. There is also potential to cite as supporting evidence further 2019 NPPF text on low-carbon energy generation because it is more exacting in terms of renewable and low-carbon energy. For low emission vehicle charging facilities, the policy could set out specific requirements. For example, instead of stating 'charging facilities for plug in vehicles should be provided where practical', a minimum percentage should be required.

For local renewable energy generation - as the policy stands, giving support to renewable energy in principle with no further detail has now become a simple restatement of national policy. As such, significant further, locally specific detail and evidence is needed, such as, for example:

- Requiring stringent minimum energy efficiency standards (for both residential and non-residential development);
- Seeking opportunities to retrofit renewable energy generation to existing development when there is the opportunity to do so through planning permissions;
- Recognising the importance of the policy cycle, in other words, setting AP13 in the context of the wider process to reduce carbon emissions;
- Clarity in the supporting text on whether community-led renewables infrastructure has ever been trialled in the Neighbourhood Plan area, and if so, what the outcomes were- and if not, why not;
- Specific infrastructure and/or specific locations suitable for its installation should be mentioned, what the criteria for support would be (if relevant), and how it might be funded, for example through developer contributions;
- Mentioning the potential or otherwise for a district heating scheme;
- Requiring a carbon reduction plan to be submitted as part of a development application; and
- Recognising that the above requirements will need to be balanced appropriately with their potential impact on statutorily-protected heritage assets.

The policy consists of three sentences in a single paragraph, each seeking a separate objective (renewable energy generation, charging for low-emission vehicles and electric cycle charging). Its effectiveness would likely be enhanced if it were split into separate paragraphs or clauses, particularly given that the recommendations in this EBPD are likely to result in the text increasing in length in any case.

The adopted policy had to use relatively weak language ('promoted', 'should be', 'encouraged') which reduces its effectiveness. The 2019 NPPF, by contrast, justifies firmer text such as 'should', 'require' and so on.

The five neighbourhood-plan wide recommendations made in the effectiveness section of the review of Policy AP9a above would also, if implemented, have significant potential to enhance the effectiveness of policy AP13.

As a cautionary point, while more restrictive wording is certainly justified in the current policy context, the Town Council should prepare for a degree of resistance from the development industry on viability grounds and have appropriate regard to sections 1.3.3 and 3.2 of this report when considering how it might be strengthened.

In formulating revisions to AP13, the recommendations of this EBPD should be taken into account alongside relevant conclusions from AECOM's separate but complementary Design Guidelines report.
--

Appendix 2: Relevant ‘made’ neighbourhood plan policies

Alongside the advice presented in this report, the Town Council may find it helpful to refer to the following neighbourhood plans that have now been ‘made’ or adopted, and many of which AECOM advised as the neighbourhood planners developed their plans. All of the neighbourhood plans listed are available online.

‘Made’ neighbourhood plan	Relevant policy/policies	Corresponding Stroud policy
Ashted Neighbourhood Plan (adopted 2016)	Policy AS-H2: Balancing the Housing Mix	AP4- General Housing
Botesdale & Rickinghall Neighbourhood Plan (adopted 2020)	Policy B&R 9 – Housing Mix	AP4- General Housing
Sid Valley Neighbourhood Plan (adopted 2020)	Policy 11 – Affordable Housing within the BUAB	AP4- General Housing
Thurston Neighbourhood Plan (adopted 2019)	Policy 2 – Meeting Thurston’s Housing Needs	AP4- General Housing
Kingston Neighbourhood Plan (adopted 2019)	Policy KNP5 – Housing Development	AP4- General Housing
Wincanton Neighbourhood Plan	Policy 9 – Accessible and Adaptable Homes	AP4- General Housing
Bridport Neighbourhood Plan (adopted 2020)	Policy L2: Biodiversity	AP9a – General Design Principles
Harpenden Neighbourhood Plan (adopted 2020)	Policy ESD14: Trees and Hedges	AP9a – General Design Principles
Hazelbury Bryan Neighbourhood Plan (adopted 2018)	Policy HB5: Locally Distinctive Development	AP9a – General Design Principles
Knightsbridge Neighbourhood Plan (adopted 2018)	Policy KBR 10: Urban Greening	AP9a – General Design Principles
Long Ashton Neighbourhood Plan (adopted 2016)	Policy LHN1: Provision of well-designed energy efficient buildings and places	AP9a – General Design Principles
Wye Neighbourhood Plan (adopted 2016)	Policy WNP10: Density and layout	AP9a – General Design Principles
Altrincham Town Centre Neighbourhood Business Plan 2015 to 2030 (adopted 2017)	Policy G- Green Infrastructure	AP9b – Public Realm
East Preston Neighbourhood Plan (adopted 2015)	Policy 8: Sustainable Drainage	AP9b – Public Realm

'Made' neighbourhood plan	Relevant policy/policies	Corresponding Stroud policy
Poole Quays Forum Neighbourhood Plan (adopted 2017)	PQF1: Public Realm	AP9b – Public Realm
Ascot, Sunninghill and Sunningdale Neighbourhood Plan (adopted 2014)	Policy NP/EN5- Green Corridors	AP9b – Public Realm
Woughton Community Neighbourhood Plan 2017-2031 (adopted 2017)	Policy WN7 Trees in the Public Realm	AP9b – Public Realm
Much Wenlock Neighbourhood Plan (adopted 2014)	Policy SCC2	AP13 -Energy
Bourton Neighbourhood Plan (adopted 2017)	Policy 8: Mitigating and Adapting to Climate Change	AP13 -Energy
Faringdon Neighbourhood Plan (adopted 2016)	Policy 4.13C: Alternative Energy Schemes	AP13 -Energy
Fernhurst Neighbourhood Plan (adopted 2016)	Policy EE1: Biomass Energy	AP13 -Energy
Lawrence Weston Neighbourhood Plan (adopted 2017)	Policy CSF4: Community infrastructure priorities to be funded from developer contributions	AP13- Energy
Knightsbridge Neighbourhood Plan (adopted 2018)	Policy KBR 36: Renewable Energy	AP13 -Energy
Malborough Neighbourhood Plan 2014-2034 (adopted 2018)	Policy 13: Support for Small Scale Renewables and Low Carbon Energy Schemes	AP13 -Energy
Long Ashton Neighbourhood Plan (adopted 2016)	Policy LHN 1: Provision of well-designed energy efficient buildings and places	AP13 -Energy

Appendix 3: Resources for neighbourhood planning in a climate emergency

The following documents are particularly likely to be helpful to neighbourhood planners seeking to respond to climate emergency declarations by ensuring that environmental sustainability and climate change mitigation and adaptation take centre stage in their emerging or replacement Neighbourhood Plans.

- Centre for Sustainable Energy (CSE's) 'How Green Is My Plan?' toolkits- there are two of them, one for rural and one for urban/suburban
<https://www.cse.org.uk/downloads/reports-and-publications/policy/community-energy/planning/renewables/how-green-is-my-plan-rural.pdf>
<https://www.cse.org.uk/downloads/reports-and-publications/policy/community-energy/planning/renewables/how-green-is-my-plan-urban-suburban.pdf>
- Neighbourhood Planning in A Climate Emergency (TCPA, Esmée Fairbairn Foundation and CSE)- this is a February 2020 update and expansion of the previous 'Low-Carbon Neighbourhood Planning' guidance published in 2018
<https://www.cse.org.uk/downloads/reports-and-publications/policy/planning/renewables/neighbourhood-planning-in-a-climate-emergency-feb-2020.pdf>
- CSE's How To Identify Suitable Areas for Onshore Wind Development In Your Neighbourhood Plan
<https://www.cse.org.uk/downloads/reports-and-publications/community-energy/planning/neighbourhood-planning-wind-guidance.pdf>
- Locality's Neighbourhood Planning for the Environment toolkit, which considers how neighbourhood plans might consider climate change mitigation and adaptation
<https://neighbourhoodplanning.org/wp-content/uploads/Environment-Toolkit-20181220.pdf>

Appendix 4: Further guidance on neighbourhood planning policy

Further advice can be found in the following places:

- The full range of technical support packages available through Locality can be found at: <https://neighbourhoodplanning.org/about/technical-support/>
- Advice on writing planning policies is can be found by following the link below: <https://neighbourhoodplanning.org/toolkits-and-guidance/write-planning-policies-neighbourhood-plan/>
- Advice on drafting Neighbourhood Development Orders and bringing forward community-led housing is available on the Locality website: <https://neighbourhoodplanning.org/toolkits-and-guidance/neighbourhood-development-orders-community-right-build-orders/>

These best practice toolkits, together with a final health check, which is available free of charge, will aid the Town Council in ensuring the Plan meets the Basic Conditions that enable a draft plan to proceed to referendum.

