

Response to Initial Consultation on Neighbourhood Plan

Introduction and Context

1. Stretton Climate Care is an environmental charity with its main mission to reduce carbon emissions in our area, which is an area approximately a 6 miles radius (about 10 kilometres) radius centred on Church Stretton. Our area's greenhouse gas emissions include carbon emissions and other gases which can be converted to equivalent carbon emissions.
2. We have been operating since 2007 and we have become established as a trusted member of our local community offering sound advice and practical action to reduce carbon emissions and improve the energy efficiency of our area. Since 2007, a climate crisis has become a climate emergency as world leaders have not taken the sufficient action to curb emissions.
3. In our first few years we arranged for hundreds of properties to have loft and cavity walls insulated either without charge or for a nominal charge. We have made hundreds of referrals to reliable installers of renewable energy and heating and advised hundreds of clients by telephone, in their homes and by email on all aspects of energy use and equipment. Just last week at our regular advice session at the Health and Wellbeing Centre, we had people queuing up for advice on how to reduce their emissions. We have seen a huge increase in the installation of solar panel and air source heat pump installations this year. Our local community is increasingly supportive of action to reduce emissions.
4. We have supported Church Stretton Town Council by introducing them to energy efficiency installers who hugely reduced the energy bills on the Council offices and we also worked in partnership to achieve the installation of the first Electric Vehicle Charge Point in a public car park in Shropshire. We are strong advocates for Active Travel and have provided a response to Shropshire Council on their draft Plan.
5. We have held a monthly Repair Café which has prevented many objects being disposed of which would have resulted in embedded carbon emissions being generated by new product purchases. We have worked with local businesses to support them in adopting a more sustainable approach to their operations.
6. Derived from Department for Energy and Net Zero data, Shropshire e-CO₂ emissions are provided in Figure 1 below. These do not include aviation, shipping nor military transport nor embedded carbon in purchased or disposed of products. Our area will be somewhat different to the Shropshire average with more car travel, more oil-fired heating and therefore a higher percentage of emissions from transport, housing and agriculture. Our area does not have a significant number of industrial premises creating emissions and the aggregated

subtotal shown is likely to be a lower percentage in our area.

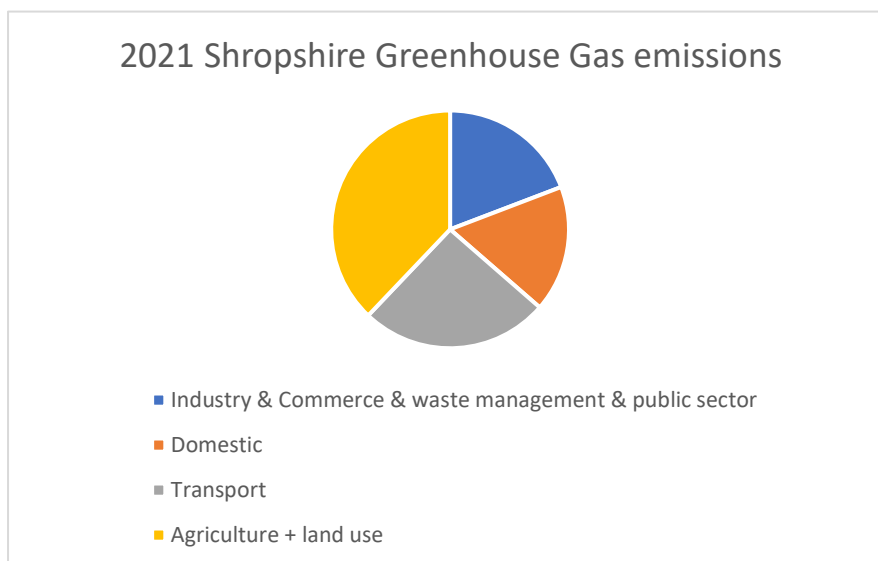
Figure 1 CO₂-e emissions in Shropshire, 2021

Sector	%
Industry & Commerce & waste management & public sector	19.2
Domestic	17.2
Transport	25.7
Agriculture + land use	37.9

source DESNZ national statistics

These exclude Aviation, Shipping and Military Transport and embedded emissions in products

Agriculture is a net figure after deducting negative emissions from forestry etc



7. The total CO₂-e emissions for Shropshire on this basis is estimated at 1,679,700 tonnes in 2021 and this is a net figure after deducting negative emissions such as sequestration of carbon by growing trees. This figure needs to reach zero by 2050 with about half of that by 2035, towards the end of the Plan period. This is a very significant challenge for all sectors.
8. We recognise that a Neighbourhood Plan can only influence the reduction of some of these emissions as it is constrained by Statute, Regulations and National guidance, in particular the National Planning Policy Framework (NPPF). This latter document is due for a further update in the week commencing 11th December and a more radical update in 2024 when Nationally Determined Development Management Policies are to be introduced. It is also likely that should there be a change of government the NPPF will change further before the Neighbourhood Plan's Regulation 16 submission. We expect those changes will require further actions towards achieving net zero as it is widely recognised that the current NPPF does not adequately enable planning policy and decisions to

support the path to net zero.

9. We also recognise that we live in a beautiful area which is rightly subject to a range of environmental constraints which must be carefully considered when planning any form of changes to buildings and land.
10. During the Plan period there will be a modest addition to the existing building stock. Most of the buildings- houses, commercial premises and others- are already completed and some not yet built already have planning permission. Therefore, although reducing carbon emissions from planned buildings is important, the major reductions will arise from upgrading and retrofitting existing buildings as well as changes to the way we use them. We will propose ways in which the Neighbourhood Plan could support this process.
11. In terms of reduction in emissions from transport, we recognise that the Neighbourhood Plan is not a Local Transport Plan, but the land use and infrastructure used by transport and the location of new development can have significant implications for the level of carbon emissions from transport.
12. The Neighbourhood Plan can influence the way in which non-developed land is managed with a view to reducing carbon emissions. Tree planting and appropriate management of grasslands, nature conservation areas and green spaces can also help to sequester carbon in the soil.

Our objectives for the Neighbourhood Plan

13. For new housing, the current national policy context is based on an upgrading of the Building Regulations from 2025 to the Future Homes Standard, which follows the minor upgrade implemented in in 2022. The Future Homes standard will in effect require zero carbon ready homes. There can be no guarantee that this upgrade in standard will take place as the government has not confirmed this and recent policy announcements have thrown doubt on the government's commitment to this policy. It was supposed to be implemented a decade earlier and with the current uncertainty surrounding government policy and actions we consider that the Neighbourhood Plan should include Policies to require all homes to be "zero carbon ready" with significantly improved insulation, on-site or off-site renewable power generation, air tightness and probably with mechanical ventilation systems recovering heat from the extracted air. It is unlikely that housing whose main heating is powered by electricity will be provided with a gas connection because of the significant cost involved compared to the small amounts of gas likely to be used. Therefore, these homes will become "zero carbon ready". These policies should also apply to extensions to buildings. Zero carbon ready homes will become zero carbon homes as our electricity supply becomes de-carbonised. These Future Homes will have dramatically reduced energy costs, which in due course will not fluctuate with international fossil fuel market prices.

14. Conservation of limited drinking water resources is necessary in the Neighbourhood Plan area. Most water is supplied from Shrewsbury and abstracted from the River Severn whose flow is maintained by the Shropshire Ground Water Abstraction scheme. The Reservoir in Church Stretton has a limited capacity as does the main from Shrewsbury and relies upon being re-filled overnight. We have had several summers where the ground water abstraction was operating at virtually full capacity as water levels in the Severn dropped and also when demand for water in Church Stretton threatened to exceed the capacity available. As a consequence, constraints on hosepipe use were called for by Severn Trent. Producing drinking water consumes energy resources contributing to global heating and increasing the capacity of the infrastructure would require potentially environmentally damaging consequences. Farmers in North Shropshire have expressed concern about the effects of the ground water abstraction. Policies should therefore be included in the Plan to require all forms of development to install water saving taps, showers, WC's and similar appliances and for rainwater to be stored and filtered for non-drinking purposes such as flushing toilets and watering gardens or require a consumption limit set in litres of water per day. Currently the Shropshire Local Plan deposit draft puts forward a requirement for water efficiency in Policy DP20 but the Plan is still being examined and some doubts have been expressed that it may not be finally adopted. There are also other aspects of water conservation covered by Policy DP19 which might need to be included in the Neighbourhood Plan if the Shropshire Plan is not adopted.
15. There are inevitably a whole series of other policy consequences for the Neighbourhood Plan if the Shropshire Local Plan is not adopted.
16. A Policy related to building energy efficiency and incorporation of renewable energy may not be required if it becomes certain that national policies and regulations make this unnecessary. A special Policy for our area can be justified in terms of the need to maintain our special environment which is being seriously damaged in terms of biodiversity by changes to our climate. In addition, we have already had a death as result of a tragic road traffic accident on the A49 during a major storm when a falling tree impacted a vehicle as well as more frequent flooding in the town, all arising from the increase in the severity of wind and rainfall caused by global heating. Church Stretton is characterised by many outstanding trees and avenues which could suffer storm damage as the severity of storms is increased by climate change. These are justifications for requiring higher standards of energy efficiency and incorporation of renewable energy.
17. Although well insulated homes will remain cooler in summer, solar gain can cause over-heating. Wherever practical the design and orientation of buildings should facilitate the generation of energy from the sun and be designed to ensure that over-heating in the summer does not occur with built in shading elements,

while taking advantage of solar gain in the cooler months. Deciduous trees can assist summer shading while enabling solar gain in winter months.

18. The standards advocated here are readily capable of being implemented by construction companies and still have a significant scope for improvement in terms of energy demand when compared to for example, the Passivhaus standard. Increases in energy efficiency do greatly benefit the occupier in terms of lower bills and greater comfort. A legal opinion on uprating Neighbourhood Plan policies to improve energy efficiency is set out as an Appendix to this linked document: <https://tattenhallpc.co.uk/wp-content/uploads/2021/03/Item6-draft-guidance-Evidence-for-binding-Energy-Efficiency-policies.pdf> . Although we are not advocating standards as high as the Passivhaus standard, see also: <https://www.passivhaustrust.org.uk/news/detail/?nId=1209>
19. We already benefit from the compact nature of most of our housing in Church Stretton enabling easy access to facilities. Clearly access to facilities from All Stretton and Little Stretton requires somewhat longer journeys but these are capable of being cycled or for some on foot. We advocate that as far as possible new housing developments should be located within or on the edge of these settlements rather than in the rural area. This will encourage access to facilities by active travel and reduce carbon emissions as well as having a beneficial effect on health and wellbeing. Housing developments should provide good access to the footway network and where applicable, the cycle network. Access to public transport should also be required wherever possible. Secure cycle and mobility scooter storage with charging facilities should be provided as part of all housing developments. All external lighting should be low energy, designed to avoid causing light pollution.
20. Our area requires a significant increase in affordable housing which will enable households who work in Church Stretton to live locally. Current housing is unaffordable for many households which results in a lot of commuting, increasing carbon emissions and costs and adds to the age imbalance in our community.
21. The Neighbourhood Plan should include control over the change of use of housing that is permitted in the Plan to become “principal residences” as set out in the St Ives Neighbourhood Plan <https://www.stivestowndean.org.uk/wp-content/uploads/2020/06/St-Ives-Area-Neighbourhood-Development-Plan.pdf> preventing their use for self-catering holiday lets and Airbnb. It is possible that future changes to planning legislation may also require planning permission for the change of use of existing properties to self-catering holiday lets and Airbnb. If that occurs during the Plan preparation period, we advocate that the Plan should adopt a Policy to control the proportion of properties converted to such uses to maintain the availability of homes for local people. This will also help to reduce carbon emissions by reducing the need to travel into Church Stretton for work.

22. Developments will be subject to the new requirement for a 10% Biodiversity Net Gain (BNG). The requirement for smaller developments (less than 10 houses) will apply later in 2024 and as a reduced requirement. If the BNG cannot be accommodated on site it can be applied anywhere in England. It is recommended that a site for such off-site BNG be designated in the Plan area. New housing developments should incorporate green spaces, with wildlife provision including ponds, hedges, bat and bird nest boxes and roosts.
23. For new commercial, industrial and public buildings including schools we advocate that the Breeam¹ Excellent standard should be required in the Neighbourhood Plan. The justification for this requirement is similar to that stated above for domestic buildings but the Building Regulations are not proposed to be upgraded to the same extent as the Future Homes Standard. The Excellent standard is not the top rating of the Breeam standard. It is estimated to add an additional cost of between 0.7% and 1.8% to the capital budget for construction. Some exemptions for very small-scale development may be appropriate where attaining such a standard may be challenging. The benefit in terms of reduced energy costs and improved ability to let the property will benefit the occupier and owner. Good facilities for pedestrian and cycle access and parking should be provided.
24. The vast majority of housing, commercial, industrial, and other buildings ranging from schools to churches, meeting places and other service and cultural uses in the Plan area at the end of the Plan period in 2038 are already built. Most will need to be considerably upgraded to eliminate as far as possible their carbon emissions and reduce the energy costs incurred by occupiers. Policies in the Neighbourhood Plan should support this retrofitting, where planning permission may be required, by supporting such proposals.
25. Conservation areas are designated to include large areas of the town and the smaller settlements within the Plan area. The Policies of The Plan should accept that changes will be required to the appearance of many of the buildings within these Conservation Areas in order to achieve the required energy efficiency standards. It will not be practicable in many cases for all the required wall insulation, for example, to be installed internally. Clearly the law requires that special attention has to be paid to preserving or enhancing the character of a Conservation Area. However, this does not mean that appropriate changes should not be made which support the sustainability and continued use of a building. As it is expensive and complex for an individual property owner to determine what may be an acceptable approach, it would be useful if the Town Design Guide were to be updated to give consideration to the issue of external wall insulation and when and how it could be used in individual areas/types of

¹ See <https://tools.breeam.com/filelibrary/Briefing%20Papers/BREEAM-Briefing-Paper---The-Value-of-BREEAM--November-2016---123864.pdf> & <https://www.shropshire.gov.uk/media/21073/ee-commercial-buildings-34-general.pdf>

buildings without causing significant harm.

26. For buildings which are listed as of special architectural or historic interest Historic England guidance indicates that the heritage interest of the building will need to be maintained while enhancing the energy efficiency of the building and where appropriate installing renewable energy infrastructure. Most of these buildings will require an individual expert assessment. Historic England is currently consulting on revised guidelines which give greater recognition to the need to make changes in appropriate circumstances to enable listed buildings incorporate alterations to their fabric.
27. For transport related policies, we would advocate that the Plan should foster the take up of active travel modes -cycling and walking- in the town. Shifting car-based trips to active travel will reduce the need for developments to set aside land for car parking and produce a more pleasant environment in the town centre with a reduction in noise, pollution, carbon emissions and reduced visual intrusion resulting from parked motor vehicles. Such improvements bring health and wellbeing benefits as well.
28. Some of the areas currently set aside for parked vehicles such as in The Square, and High Street could be used for a range of activities with quality landscaping making the town more attractive to both residents and visitors. The Plan should advocate an enhancement of the environment in the area around The Square with reduced access by motor vehicles.
29. More secure cycle parking and mobility scooter parking will also need to be provided around the town centre with charging facilities. This will encourage sustainable travel.
30. Where significant development is proposed in the vicinity of proposals in Shropshire Council's Active Travel Plan, the opportunity of the development supporting such provision should be pursued.
31. At present, there is significant visual intrusion created by cars parking in Carding Mill Valley. The National Trust in conjunction with Town Council should investigate the option of providing a Park and Ride facility in the vicinity of the railway station. The bus service to this facility would also provide an opportunity to improve integration between bus and rail services.
32. Proposals for renewable energy generation should normally be supported subject to there being no significant harm to the environment or to the amenities of the area.
33. Areas important for nature conservation and wildlife should be identified and protected from development. Areas should be identified which could be used to extend or join up with existing sites of wildlife importance. Better protection of

ancient trees is required.

34. Very few of the proposed actions in Shropshire Council's Surface Water Management Plan produced in 2011 have been implemented. Some 17% of the homes in Church Stretton are in areas which may flood and investment in appropriate infrastructure is urgently needed as global heating increases the frequency and intensity of flooding. The Management Plan needs review and updating. The Neighbourhood Plan should refer to the adaptation that is needed to eliminate and alleviate the flooding that occurs and is potentially likely to occur. It may well be that some land may need to be identified for the construction of intercepting flood storage areas or if this is not possible within the resources available to incorporate policies addressing the need for flood prevention measures whether as hard or soft infrastructure.

Concluding Comments

35. Church Stretton Town Council has declared a Climate Emergency and should use the opportunity of preparing the Neighbourhood Plan to address the issues that are raised by this Emergency. The flooding, storms, property damage and loss of biodiversity and so on will continue to mount as global temperatures rise as a consequence of increasing levels of carbon emissions. We believe that every organisation and individual has a responsibility to address this crisis and take whatever actions are appropriate and necessary to reduce our greenhouse gas emissions.
36. During the current year, we have been engaging with younger people to explore their views on climate change and support their understanding of the issues. We have been donating books on climate change to both Church Stretton schools and have engaged in workshops in support of their teachers. Young people are very concerned about the impact that climate change will have on their lives and our planet. We owe it to them to do everything we can to reduce global heating and the Neighbourhood Plan presents an opportunity to progress this.
37. Stretton Climate Care will be pleased to support Church Stretton Town Council in the preparation of the Neighbourhood Plan and where our Response is unclear, lacks detail or requires further clarification we will make every endeavour to meet any request.
38. This response pre-dates the update to the NPPF published on 19th December 2023. Should it appear appropriate to make supplementary comments in the light of the revisions made, these will be submitted in the New Year.