Stratford on Avon District Council Development Supplementary Planning Document (SDP) Draft Part V: Climate Change ADAPATION and MITIGATION.

Welford on Avon Parish Council Consultation Response.

Description:

The Climate Change SDP will ask developers to integrate some mitigation and adaptation measures in any housing development. Once it's adopted, whenever homeowners or developers submit a planning application, they must also include a completed checklist identifying all of the adaptation and mitigation measures to be implemented on the site.

There are 3 different checklists, depending on type of development and /or developer:

Climate Change measures: Checklist new builds (non-householder) developments where over 20 square meters of additional floorspace is proposed. At least 15 measures must be implemented.

Climate Change measures: Checklist for conversions and change of use developments, at least 10 measures must be implemented.

Climate change measures: Checklist for Householder development where over 20 square meters of additional Floorspace is proposed. At least 5 measures must be implemented.

The checklists all follow the 5 main principles: Increasing accessibility (1), Improving energy efficiency in buildings (2), Adapting to Higher Temperatures (3), Mitigating Flood Risk (4), Mitigating biodiversity Loss (5). There will be minimum requirements for each site but applicants can choose which measures to use.

The document comes with case studies in Warwickshire of effective and successful developments which are fit for climate crisis adaptation and/or mitigation, both in towns and villages.

Comments:

As representatives of a village vulnerable to flooding, Welford on Avon Parish Council are pleased to see that such a document has been produced by SDC, which once adopted could bring important and beneficial changes to the future development of our village, and positively influence the way developers, both commercial and householders, design and plan housing. Nevertheless, the document reads more as 'advisory' guidelines, and while we understand that this document is based on the existing Core Strategy, we believe that as it stands the SPD would allow speculative and other developers to do the minimum required for adaptation and mitigation. Therefore, given that the Council has recognised the climate emergency, the requirements must be more forceful, e.g. 'mixed use developments should be encouraged' (p5). We suggest to replace 'should' with 'must'.

In line with Principle 1 (Increasing accessibility) SDC should do more to stress the co-benefits of measures to reduce emissions and adapt to the impacts of climate change. For example, reducing personal car use will have a huge impact on local air quality, therefore for non-householder developments, no matter how large or small, WCC should be involved from the outset in looking at cycling connectivity and other types of transport, with a focus on villages which often lack connectivity infrastructure and where residents depend mainly on personal car travel.

A programme of tree-planting in all types of developments – or in consultation with parish councils to find suitable locations to mitigate loss of biodiversity (Principle 5)-will also reduce emissions by carbon capture, and support adaptation to high temperatures (Principle 3). Developers (householders and commercial) must ensure no tree is cut down unless necessary and unless this has been mitigated and compensated elsewhere in the developments, or offsite through an official carbon offsetting scheme. Therefore, we ask that all new developments should demonstrate, if applicable, a zero net tree loss.

SuDS (V.5.1, p.21) must be high quality and well designed. In most new developments, SuDS are designed out during the planning process, leaving the development with low quality measures (for example a dip in the ground which results in a fenced-off pond). SuDS should be integrated into the development from the outset and be multi-functional (for example playgrounds).

There are other types of green infrastructure in addition to those mentioned in V.4.3 p.17. Consideration should be given to wetland areas, woodlands, wildlife areas, green bridges, wildflower verges and meadows, reedbeds, water retention, etc. in the development. These have multiple benefits for climate, biodiversity, and for residents and can be very low cost to the developers.

Natural flood management measures are another very effective way of mitigating flood risk (Principle 4), for example 'slowing the flow' by increasing the resistance to surface (by planting trees and hedgerows, and installing leaky dams), and with more ambitious, multifunctional SuDS.

Response agreed at Parish Council Planning Committee Meeting, Tues 18th Feb 2020.

Comments submitted 19th Feb 2020 via email to:

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