

**Planning and Compulsory Purchase Act 2004
Town and Country Planning (Local Planning) (England)
Regulations 2012
Stratford-on-Avon District Site Allocations Plan**

**Statement of Compliance
with the Duty to Co-operate**

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1. Introduction

- 1.1 The Localism Act creates a duty on Local Planning Authorities to co-operate with each other and other bodies to address strategic issues relevant to their areas – known as the Duty to Co-operate. This document outlines Stratford-on-Avon District Council’s compliance with the Duty to Co-operate in respect of the Site Allocations Plan.
- 1.2 This report summarises the ongoing and constructive engagement SDC has undertaken and identifies where strategic cross-boundary issues exist in the context of the Site Allocations Plan. As required, the Council is in the process of preparing Statements of Common Ground to confirm the outcomes of the engagement process. These will be submitted alongside the Site Allocations Plan.
- 1.3 It should be noted that, although a Development Plan Document (DPD) in its own right, the Site Allocations Plan is subservient to the Stratford-on-Avon Core Strategy, adopted July 2016 which establishes the strategic planning policy framework within which the Site Allocations Plan sits. This includes the development strategy and approach to the distribution of development set out in Policies CS.15 and CS.16 in particular.
- 1.4 As such, the extent of strategic cross-boundary issues dealt with within the Site Allocations Plan is limited. The adopted Core Strategy and its accompanying Statement of Compliance with the Duty to Co-operate can be viewed at www.stratford.gov.uk/corestrategy and www.stratford.gov.uk/siteallocations, respectively.

2. Context

2.1 Legal Context and Guidance on the Duty to Co-operate

- 2.1.1 The Localism Act (Section 110) transposes the Duty to Co-operate into the Planning and Compulsory Purchase Order Act 2004 at Section 33A. It makes clear that the duty applies to all local planning authorities, county councils and prescribed bodies, as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The new duty requires these bodies to ‘engage constructively, actively and on an ongoing basis’ on the preparation of development plan documents ‘so far as relating to a strategic matter’. Strategic matters are defined as relating to:
 - a) sustainable development or use of land that would have a significant impact on at least two local planning areas including use of land in connection with infrastructure that is strategic and would have a significant impact on at least two planning areas; and
 - b) sustainable development or use of land in a two-tier area if the development or use is a county matter or would have a significant impact on a county matter.
- 2.1.2 The duty requires that councils set out planning policies to address such issues and requires them to consider joint approaches to plan making.

2.1.3 The National Planning Policy Framework (NPPF) builds on the requirements of the Localism Act. It indicates that public bodies should:

- Co-operate on cross boundary planning issues;
- Undertake joint working on areas of common interest;
- Work collaboratively with other bodies to ensure that strategic priorities are properly co-ordinated and clearly reflected in Local Plans;
- Consider producing joint policies and strategies;
- Work collaboratively with Local Enterprise Partnerships, Local Nature Partnerships, private sector bodies, utility and infrastructure providers;
- Demonstrate evidence of effective co-operation when submitting a local plan for examination (e.g. a Memorandum of Understanding or jointly prepared strategy or evidence); and
- Satisfy the tests of soundness relating to positive preparation and effectiveness.

2.1.4 Strategic priorities as identified in the NPPF (at para 156), for which strategic policies should be developed, relate to the following:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

2.2 Stratford-on-Avon District Context

2.2.1 Stratford-on-Avon District is at something of a crossroads between different counties. Although it is part of Warwickshire, it borders Northamptonshire, Oxfordshire, Gloucestershire and Worcestershire as well as the Metropolitan Borough of Solihull and two other Warwickshire districts/boroughs, namely Warwick District and Rugby Borough.

2.2.2 Parts of the District fall within the Cotswolds Area of Outstanding Natural Beauty and within the West Midlands Green Belt. The AONB is the largest in England and Wales and extends south-westwards from the southern part of the District to the edge of Bath. It is a national designation aimed at mainly conserving the natural beauty of the landscape and countryside, and it shows that there is a degree of consistency in the character of the landscape ranging across administrative boundaries.

- 2.2.3 The West Midlands Green Belt extends all the way round the Birmingham and Black Country conurbation as well as around Coventry. It was established through previous development plans and has a range of functions including the control of urban sprawl and the prevention of towns merging into one another.
- 2.2.4 The connections of the district with areas beyond its boundary are also evident in the form of significant transport routes that cross the district, not least of which are the M40, the M42, together with the Chiltern and Shakespeare railway lines which provide direct links with Birmingham and London. The Cotswolds railway line skirts the south-west corner of the district and provides access to Worcester, Oxford and London.
- 2.2.5 Interaction with adjoining areas takes a number of forms. In terms of people, interaction is often seen in the form of journeys to workplaces, to places of education, to shops, healthcare and other facilities, and to visit friends and relations. Of these different types of journeys, commuting to and from work and places of education tends to have the greatest routine impact on the transport network.
- 2.2.6 In addition, interaction with neighbouring areas comes in other forms such as migration in and out of the District to live as well as the distribution of raw materials and goods to and from other parts of the country to support the national and global economy. The District has strong environmental links with different areas, for example through its river valleys and sources of water supply. There are sub-regional green infrastructure links that pass through the District which are beneficial not only in terms of supporting biodiversity but also in helping manage the impacts of climate change, and in supporting leisure and recreational uses.
- 2.2.7 Stratford-on-Avon District is within a two-tier area, with Warwickshire County Council providing public services such as education, highways and social services. Along with Warwickshire County Council, Stratford-on-Avon has important connections with neighbouring authorities particularly with regard to transport and accessibility, housing and economic development. For these reasons, it is particularly important that Stratford-on-Avon District Council co-operates with its neighbours as well as Warwickshire County Council and the Local Enterprise Partnership.
- 2.2.8 Alongside Neighbourhood Plans for relevant parishes and the county-wide Mineral and Waste Local Plans, the Development Plan for Stratford-on-Avon District will comprise the:
- Core Strategy – a ‘tier 1’ plan that sets the vision and overall development strategy for the District and principles of development for the period 2011-2031
 - Site Allocations Plan – a ‘tier 2’ plan that identifies additional specific sites, including reserve housing sites that will be brought forward as necessary by 2031
 - Gypsy and Traveller Plan – establishing specific policies to meet the needs of Gypsies and Travellers and Travelling Showpeople to 2035

2.3 Site Allocations Plan

2.3.1 The Site Allocations Plan is a 'tier 2' plan that accompanies the Stratford-on-Avon Core Strategy, adopted July 2016. It identifies a number of additional proposals, all of which are consistent with, and sit within the development strategy and strategic planning framework context established by the Core Strategy. The proposals contained with the Site Allocations Plan relate to the following:

- (a) Reserve Housing Sites
- (b) Custom-build and Self-build Housing Sites
- (c) Built-up Area Boundaries
- (d) Employment Enabling Site
- (e) A46 Safeguarding
- (f) Specific Site Proposals

3. Process of Co-operation

3.1 Introduction

3.1.1 This section outlines the various processes and partner organisations by which engagement has taken place with neighbours and other strategic bodies. The strategic issues addressed and the solutions or outcomes reached are set out in section 4.

3.2 West Midlands Combined Authority (WMCA)

3.2.1 Stratford-on-Avon District Council is a non-constituent member of the West Midlands Combined Authority (WMCA). It is represented on its various boards by elected Members, the work of which is supported by a number of officer groups. The most relevant for plan-making are the Housing and Land Board and Steering Group. The Council plays an active part of both the Board and the Group.

3.2.2 In particular, the Council has provided input into the WMCA's Spatial Investment and Delivery Plan that sets out a framework for growth that includes priority sites and growth areas and associated infrastructure requirements and the actions participating authorities, including the WMCA and its strategic partners would take to support the delivery of new homes and employment opportunities in the region.

3.3 Coventry and Warwickshire Local Enterprise Partnership

3.3.1 Stratford-on-Avon District sits within the sub-region formed by Coventry and Warwickshire. The Coventry and Warwickshire Local Enterprise Partnership (CWLEP) was established to promote sustainable growth and job creation across the sub-region. The Council is represented on its Board and has been involved in the joint working which led to the publication of the Strategic Economic Plan (SEP) in March 2014 as well as more recently the preparation of its Local Industrial Strategy.

3.3.2 The CWLEP governance structure includes a number of 'business' groups including the Planning and Housing Group, which brings together representatives from the development industry and the local authorities. The Council plays an active part in this group.

3.4 Coventry and Warwickshire Economic Prosperity Board and Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

3.4.1 There are well established mechanisms to promote strategic co-operation and joint working within the Coventry and Warwickshire Sub Region at both member and officer level.

3.4.2 These include the members' Economic Prosperity Board Joint Committee, which is advised by reports from the association of planning officers Duty to Co-operate group which meets monthly to discuss planning policy and strategic planning issues. As well as officers from the local planning authorities across Coventry and Warwickshire, the group is also attended by representatives from Solihull Metropolitan Borough Council, Hinckley and Bosworth Borough Council, Warwickshire County Council and the Coventry & Warwickshire LEP.

3.4.3 Various pieces of work of a strategic nature have been and continue to be commissioned on a sub-regional basis, most recently the Coventry and Warwickshire Employment Land and Market Signals Study.

3.3.4 At the meeting of the Joint Committee in November 2018 it was agreed that joint and co-operative working would extend beyond the current plan period post 2031 in respect of the preparation of technical evidence to inform strategic and cross boundary planning issues.

3.4.5 Since the Council adopted its Core Strategy, Warwick District Council and Coventry City Council have adopted their Local Plans (September and December 2017, respectively) with North Warwickshire, Nuneaton & Bedworth and Rugby Local Plans all currently at examination.

3.4.6 Underpinning all these plans is a co-ordinated approach to meeting the housing needs of the Coventry & Warwickshire Sub-region, as evidenced by the Joint Strategic Housing Market Assessment (SHMA). The co-ordinated approach, essentially to meet the shortfall in housing from Coventry, is established within a signed Memorandum of Understanding (MoU).

3.5 Greater Birmingham and the Black Country (GBBC) Housing Market Area Duty to Co-operate Group

3.5.1 Stratford-on-Avon District Council is also a active member of the Greater Birmingham and the Black Country (GBBC) Housing Market Area Duty to Co-operate Group. This group was established in light of the shortfall in housing identified in the Birmingham Development Plan. Chaired by Birmingham City Council, it comprises officers from the fourteen authorities within the housing market area, as well as officers from those

authorities with an interest in the HMA, including the WMCA. Meetings of the Chief Executives and Leaders can be convened as necessary.

- 3.5.2 As well as coming together to effectively monitor housing supply across the HMA, the group prepares and updates a position statement. The group also jointly commissioned consultants GL Hearn and Wood to prepare a Strategic Growth Study to explore how the shortfall could be resolved.

3.6 A46 Partnership

- 3.6.1 Stratford-on-Avon District Council is one of a number of local authorities and organisations that have formed the A46 Partnership which is committed to driving forward improvements to the A46. The A46 is also a key project for Midlands Connect, the regional transport partnership, who has announced a 20 year improvement plan for the road. The Council engages proactively and actively in the Partnership to help achieve the desired outcomes. The next chair of the Partnership will be from Stratford-on-Avon District Council.

3.7 Co-operation on Local Plan Making

- 3.7.1 There has been considerable co-operation on the preparation of Local Plans including:
- Joint working on the evidence base for Stratford's and neighbours' local plans
 - Formal and informal officer and member meetings
 - Extensive consultation
- 3.7.2 Stratford-on-Avon District Council has prepared or commissioned many evidence base reports to support the preparation of the Stratford-on-Avon Core Strategy. Several of these were prepared jointly with other authorities and many involved joint working with other strategic partners to address cross boundary and other strategic issues.
- 3.7.3 Under the Regulations SDC is required to consult specific and general consultation bodies¹, as well as residents or other persons carrying on business in the area for the regulated stages of consultation. This includes all statutory bodies listed under the Duty to Co-operate, as well as infrastructure providers as required by the National Planning Policy Framework.
- 3.7.4 The Regulations provide Local Planning Authorities with greater flexibility over how plans are prepared prior to Submission. In accordance with Regulation 18, the Council has held three rounds of consultation and has also consulted on key technical evidence, namely the Strategic Housing Land Availability Assessment (SHLAA) in August 2018:
- Intention to Prepare a Local Plan Consultation – August 2014

1 As defined by the Town & Country Planning (Local Planning) (England) Regulations 2012

- Revised Scoping and Initial Options Consultation – January 2018
- Further Focused Consultation – February 2019

3.7.5 The accompanying Statement of Consultation sets out how the Council has engaged in the preparation of the Site Allocations Plan including details of the methods used, comments received and how they have influenced the Plan making. This is available at www.stratford.gov.uk/siteallocations.

4. What are the strategic / cross boundary issues for the Site Allocations Plan to address?

4.1 Introduction

4.1.1 It should be noted that strategic / cross boundary issues are limited because these have already been addressed within the Core Strategy. The Site Allocations Plan sits within the development strategy context established by the Core Strategy both in terms of the distribution of development (i.e. settlement hierarchy) but also in terms of where development should be restrained (i.e. Green Belt and Cotswolds Area of Outstanding Natural Beauty).

4.2 Housing

4.2.1 The Core Strategy establishes a minimum housing figure which the Site Allocations Plan does not revisit. In accordance with Policy CS.16, the Site Allocations Plan does however identify reserve sites that will be released for three specific purposes if required, three of which have strategic cross-boundary implications as set out below:

4.2.2 The first purpose relates to remedying a shortfall in housing supply within the District. This has indirect impacts on neighbouring authorities, particularly those within the Coventry and Warwickshire Housing Market Area (HMA), the Greater Birmingham and Black Country HMA, and the West Midlands Combined Authority. This is because Stratford-on-Avon District sits within two HMAs therefore contributing to the overall total supply of homes within those HMAs. It is also relevant to the WMCA Housing Deal which commits the WMCA to delivering 215,000 homes to 2031. The reserve housing sites identified within the Site Allocations Plan are a proactive measure to ensure that Stratford District continues to meet its share of housing delivery.

4.2.3 The second purpose relates to meeting additional housing needs arising from elsewhere in the Coventry and Warwickshire HMA, although the driving force is the fact that Coventry is unable to meet its full needs within its administrative area. The MOU agrees a re-distribution of the shortfall and the adoption of local plans across the sub-region is continuing in order to ensure that housing needs are met. The reserve sites provide further certainty to ensure the housing needs of this sub-region are met.

4.2.4 The third purpose relates to additional housing needs arising from elsewhere. Primarily this includes those neighbouring authorities within the Greater Birmingham and Black Country HMA such as Solihull, Bromsgrove

and Redditch. None of Stratford's other neighbours are requesting that the District provides any further housing to meet their needs.

- 4.2.5 The Greater Birmingham and Black Country HMA comprises 14 local planning authorities. The adoption of the Birmingham Development Plan in 2017 quantified the shortfall of housing to 2031 as 37,900. The published Position Statement (February 2018) shows the shortfall reducing through a plan-led approach, with joint technical evidence suggesting additional opportunities for potential supply, thereby further reducing the shortfall. The local planning authorities are continuing to work proactively in this respect. The Site Allocations Plan proposes to release a limited number of homes to assist in addressing this shortfall as an immediate short-term solution, if deemed appropriate and necessary. The quantum is deemed appropriate in the context of the strategy of dispersal as set out in the Core Strategy. A more significant release of land would fall outside the scope of the Site Allocations Plan and within the remit of Policy CS.17, which is an early review of the Core Strategy. The Council has committed to such a review in its published Local Development Scheme.

4.3 Gypsy & Travellers

- 4.3 This issue is being dealt with by the specific Gypsy and Traveller Plan currently in preparation and is not relevant to the SAP.

4.4 Employment

- 4.4.1 The NPPF requires plans to be flexible to adapt to changing circumstances and be kept up-to-date. The Council is taking the opportunity through the SAP to amend two existing employment allocations within the Core Strategy, namely, SUA.2 and SUA.4 to respond to recent changes and better reflect the employment needs of the District. However, these amendments do not materially affect the quantum of employment land or balance of employment land with housing.
- 4.4.2 The Council is working closely with both Warwickshire County Council and Highways England to bring site SUA.2 forward.
- 4.4.3 Proposals at the University of Warwick's Wellesbourne Campus and the Quinton Rail Technology Centre are of regional importance and the Council has had discussions with Warwickshire County Council, the Coventry & Warwickshire LEP and neighbouring authorities. The SAP seeks to establish in-principle support for specific uses at these sites in order to support economic growth in accordance with both the West Midlands Local Industrial Strategy and the Stratford-on-Avon Local Industrial and Economic Development Strategy.
- 4.4.4 The rationale for including them within the SAP is to safeguard the sites and provide certainty but it is acknowledged that these are long-term projects and the specific detail is not yet known. Given that the Core Strategy housing requirement is a minimum and additional housing is

already being provided over and above the 14,600 figure, it is considered that the general balance of employment and housing will be maintained.

- 4.4.5 Arising from discussions at the LEP and confirmed by technical evidence, the proposed Employment Exceptions Site Policy is intended to provide flexibility to better help meet local employment needs and address concerns relating to the availability and affordability of employment space. Both Warwickshire County Council and the LEP are supportive of the Council's proactive approach.
- 4.4.6 Given the likely scale of such schemes, the proposal is also not considered to materially affect the general balance of housing and employment.

4.5 Water Resources

- 4.5.1 A Strategic Flood Risk Assessment (SFRA) has been undertaken to inform the identification of sites in the SAP. The study was undertaken in conjunction with the Environment Agency and Warwickshire County Council (as the Lead Local Flood Authority). In addition, the methodology used for the SHLAA takes into account flood risk and seeks to ensure that sites at risk of flooding are not subsequently identified. All proposals would need to comply with Core Strategy Policy CS.4.
- 4.5.2 In respect of water supply and water abstraction, the Habitats Regulations Assessments (HRA) undertaken in 2012 and 2014 found that no significant effects on the water environment will arise so long as the water efficiency measures outlined in the Core Strategy are put in place.
- 4.5.3 In respect of waste water, the Council has liaised with Severn Trent as the statutory sewerage undertaker to assess the capacity of water treatment works serving the District. This work has identified a constraint at Itchen Bank with work underway to consider the best way forward to increase capacity. Three other water treatment works at Longbridge (also serving Warwick District), Wellesbourne and Long Compton are close to headroom capacity based on the anticipated growth to their catchment. However, for each of these, schemes in place to provide additional capacity and quality improvements.

4.6 Natural Environment, Green Infrastructure and Landscape

- 4.6.1 The Habitats Regulation Assessment that accompanied the Core Strategy in 2014 confirmed that the Core Strategy was not likely to lead to adverse effects on any European sites and that there are strong mitigation measures included within the Core Strategy in any event. Given this and the comments from Natural England, it is not considered necessary to prepare an appropriate assessment for the Site Allocations Plan.
- 4.6.2 A sub-regional Green Infrastructure strategy was prepared to accompany the Core Strategy. The policies in the Core Strategy on Landscape, Natural Environment and Green Infrastructure are consistent with the provisions of the Sub-Regional GI Strategy and will help to deliver certain recommendations in the Strategy. Policy CS.6 seeks biodiversity gains in

accordance with Local Biodiversity Action Plan. Where relevant, specific reference to Green Infrastructure is made within the policies in the draft Site Allocations Plan.

- 4.6.3 The SHLAA technical evidence that underpins the identification of sites within the SAP takes account of landscape sensitivity, special landscape areas, areas of restraint (both identified in the Core Strategy) and the Cotswolds AONB.

4.7 Heritage

- 4.7.1 The Stratford-upon-Avon Gateway proposal directly affects the Stratford-upon-Avon Conservation Area and a number of Listed Buildings. However, the proposal is entirely consistent with the approach established in the Core Strategy; its specific identification deemed necessary within the SAP in order to proactively support and co-ordinate regeneration; the outcome being positive in respect of the protection of the significance of the heritage assets. Similarly, the identification of Wellesbourne Campus could impact upon a Scheduled Monument and the setting of the Grade 1 Listed Charlecote Park. However, its identification within the Site Allocations Plan is to help co-ordinate proposals in this respect and the Proposal itself references these heritage assets.
- 4.7.2 The SHLAA technical evidence that underpins the identification of sites within the SAP takes account of heritage assets (e.g. Conservation Areas and Listed Buildings). The application of existing policies within the Core Strategy will ensure the significance of the heritage asset is fully addressed through the detailed design of any site.
- 4.7.3 Historic England has provided comments in respect of the proposals in the Site Allocations Plan and these comments have informed the content of the Proposed Submission version.

4.8 Transport

(i) Sustainable Modes of Travel

- 4.8.1 The Council works collaboratively with Warwickshire County Council to ensure that the building of new homes and development can be accessed by travel modes other than the private car, although it is acknowledged that in rural areas such as Stratford-on-Avon District, this can be challenging.
- 4.8.2 The transport aspects of the Core Strategy aim to support the Warwickshire Local Transport Plan 2011 (LTP3). The proposals within the SAP are consistent with this approach. Following the ongoing and constructive dialogue with the County Council, where appropriate, proposals make specific reference to walking cycling and accessibility to public transport. The SHLAA technical evidence that underpins the identification of sites within the SAP takes account of accessibility to services and public transport as well as access by walking and cycling.

(ii) Highways

4.8.4 As part of the identification of sites within the SAP, Warwickshire County Council has undertaken technical work to assess the highway impacts of any proposals. The findings have informed the identification of sites.

(iii) Strategic Transport Corridors

4.8.5 As part of the identification of sites within the SAP, Warwickshire County Council has undertaken technical work to assess the highway impacts of any proposals. The findings have informed the identification of sites.

4.8.6 In terms of the Strategic Road Network, the M40, M42 and A46 all traverse Stratford-on-Avon District. Proposal SUA.2 has a direct impact upon the A46 and the Council has been liaising with both Highways England and the County Council in this respect.

(iv) Vale of Evesham

4.8.7 Stratford, Wychavon and Cotswold District Councils have previously agreed a policy approach to resist the expansion of activities that would significantly increase heavy goods vehicle movements in the Vale of Evesham, unless justified by economic benefits. This approach is set out in Core Strategy Policy CS.14.

4.8.8 The Quinton Rail Technology Centre is located within the area covered by Policy CS.14. The proposal within the SAP seeks to safeguard the principle of the existing use of the site and does not identify specific additional development requirements. Any such proposals would need to comply with Policy CS.14.

(v) Air Quality

4.8.9 Air Quality Management Areas (AQMA) have been designated at Stratford-upon-Avon and Studley, near the boundary with Redditch. The proposals at Studley are entirely consistent with the approach established in the Core Strategy; their specific identification within the SAP deemed necessary in order to proactively support and co-ordinate regeneration. Policies AS.1, AS.8 and CS.26 of the Core Strategy and the accompany Part R of the Development Requirements Supplementary Planning Document set out the Council's approach to air quality. The proposals at Studley would need to comply with the Core Strategy and SPD.

(vi) Aviation & High Speed Two

4.8.10 There are no strategic issues pertaining to aviation or High Speed Two relevant to the SAP.

4.9 Health

4.9.1 Core Strategy policies CS.24 Healthy Communities and CS.26 Developer Contributions seek to ensure that adequate infrastructure will be put in place to support growth. The relevant health organisation has been consulted in respect of the local provision of primary health services and any additional investment in premises necessary to serve the expanded population.

4.10 Education

4.10.1 The Council works collaboratively with Warwickshire County Council to ensure that the building of new homes is supported by pupil place planning and the payment of appropriate developer contributions to support school investment. It has been through this ongoing and constructive process that capacity constraints at the secondary education tier have been identified and informed the preferred strategy for the identification of reserve housing sites.

4.10.2 In addition, the Council is proposing to specifically allocate land within the SAP to facilitate the expansion of Stratford-upon-Avon High School, should additional capacity be required.

4.11 Other Infrastructure

4.11.1 Core Strategy policies CS.24 Healthy Communities and CS.26 Developer Contributions seek to ensure that adequate infrastructure will be put in place to support growth. The relevant organisations (e.g. Warwickshire County Council, Warwickshire Fire & Rescue and Warwickshire Police) have been consulted in respect of any additional investment in premises necessary to serve the expanded population.

4.11.2 Core Strategy policies CS.24 Healthy Communities and CS.26 Developer Contributions seek to ensure that adequate infrastructure will be put in place to support growth.

4.12 Renewable and Low Carbon Energy

4.12.1 There are no strategic issues pertaining to Renewable and Low Carbon Energy relevant to the SAP.