Advice from Climate Team to Planning

Reference: PL/2023/07052
Address: Western area of the MOD Boscombe Site adjacent to Stockport Road, Boscombe Down
Proposal: Provision of new site entrance, with other works to include construction of new single storey reception building, install new sections of security fencing and gates to enclose new entrance area, construct new and modify existing internal roads to facilitate vehicular movement of staff, visitors and deliveries. Construct new internal pedestrian footpaths, construct new pedestrian footpath along Stockport Road to provide link to bus stops on Stockport Avenue, construct new car parking for both staff and visitors, construct new lay-by and HGV turning circle/reject loop for large vehicles. Install cycle storage provision. Install security guard kiosk, ground mounted PV panels and close existing main entrance gate once new facility is operational.

Applications for planning permission must be determined in accordance with the relevant policies of the development plan unless material considerations indicate otherwise (ref: Section 38(6) of the Planning and Compulsory Purchase Act 2004). Section 19 of this Act places a legal duty on development plan documents, taken as a whole, to include policies designed to secure development that contributes to the mitigation of, and adaptation to, climate change.

Development Plan:

At paragraph 1.3 of the Wiltshire Core Strategy (WCS) key principles that underpin the strategy to help build more resilient communities are identified including:

- *"Working towards lowering Wiltshire's carbon footprint through the appropriate location of development, and through renewable energy and sustainable construction."*

Paragraph 1.10 states: *"**The overarching priorities are to help build and protect resilient communities through….. tackling the causes and effects of climate change**"*

Paragraph 2.10 states: *"**Climate change is a central issue to be addressed by the WCS**….. The basis of this strategy is to achieve sustainable patterns of development in order to reduce carbon emissions."*

The WCS sets out that addressing climate change as a strategic objective stating at paragraph 3.5 that: ***"Climate change is possibly the greatest long-term challenge facing the world today."***

Core Policy 41 seeks to help to reduce Wiltshire's contribution to climate change through improved design and construction methods. The policy states that: *"New development, building conversions, refurbishments and extensions will be encouraged to incorporate design measures to reduce energy demand. Development will be well insulated and designed to take advantage of natural light and heat from the sun and use natural air movement for ventilation, whilst maximising cooling in the summer."*

Core Policy 42 sets out that the principle of stand alone renewable energy projects is acceptable.

Other material considerations:

The Council is carrying out a **Local Plan Review**. This remains at a relatively early stage and so the weight that can be afforded to this is currently limited. However, the direction of

travel is reflective of wider strategic policy already adopted by Wiltshire Council, such as the **Wiltshire Climate Strategy, adopted February 2022**. This builds on the Council's February 2019 resolution to acknowledge a **climate emergency and subsequent commitment to also make Wiltshire Council carbon neutral by 2030**. Therefore, the review will likely develop a suite of replacement policies to further reduce Wiltshire's contribution to climate change and foster better community resilience to impacts from climate change.

To further underline this the **Climate change act 2008 (2050 Target Amendment) Order 2019** raised the **duty of the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline** (previously 80%).

The **National Planning Policy Framework (July 2021)** (NPPF) sets out the UK government's position on planning in England.

Paragraph 7 of the NPPF states: *"The purpose of the planning system is to contribute to the achievement of sustainable development"* and paragraph 8 makes it clear that **mitigating and adapting to climate change is a core planning objective**.

Paragraph 152 states: *"The planning system should support the transition to a low carbon future in a changing climate…. It should **help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions**, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."*

In terms of the future national direction of travel the **10 Point Plan**, **Net Zero Strategy**, **Heat and Buildings Strategy**, the **Sixth Carbon Budget** and **Powering Up Britain** are very clear. The intentions include:

- More journeys by public transport, walking and cycling;
- More electric cars; and
- More renewable energy and storage technologies.

Comments on the submission:

Based on the information on the application form this does not appear to be a major development. As such, I assume the consultation is because there is an element of renewable energy in the proposal consisting of a modest stand-alone array facing due south and angled to 40 degrees on a support frame. Subject to there being no shading these panels should operate with around 100% optimisation. The climate team would support the provision of these panels because they will generate renewable energy that is likely to support the operational energy needs of the site.

The development plan reflects that the generation of renewable energy is positive climate action with CP42 setting out support for renewable energy schemes. The NPPF is also positive and sets out a context for the need for planning to support the radical reduction of greenhouse gas emissions. Central to achieving this is the shift to renewable energy which in a location such as Wiltshire currently means significant solar PV development. We do not have significant capacity for other forms of renewables. Furthermore, the government has aims for a five-fold increase in solar PV capacity by 2035 (March 2023 document Powering Up Britain).

Whilst the solar development is modest and the benefits are proportionate, this is positive climate action. Given it's a modest array, the potential impacts on wider planning interests are similarly proportionate.

In terms of the wider development, this falls outside of my usual scope. However, I have briefly reviewed the proposals and there are a couple of simple points that should be made to the developer under CP41 of the development plan where the LPA should be supporting and encouraging the developer to take positive climate action.

- Technically BREEAM “Excellent” is required on all non-residential developments. As a rule of thumb, the development management team has only applied this on schemes over 1,000sqm in acknowledgement of viability.
- A such I suggest that in-lieu of BREEAM, a proportionate Sustainable Energy Strategy would be positive to identify how the proposal is seeking to address carbon emissions from the development.
- In this case I think it could be reasonably limited to operational carbon and I would encouraged the developer to take a fabric first approach to reduce energy demand and then seek to meet residual energy demand through low carbon and renewable energy technologies. For example, heat pumps instead of any gas/oil boilers for heating/hot water. Building integrated solar PV can then often make a building net zero carbon in operation, or close. In this case the building design is sub-optimal due to its orientation and roof pitch. However, I would anticipate circa 84% optimisation could be achieved on this building still without a redesign.
- I cannot see any provision for electric vehicle charging in the car park. As we transition to net zero it is likely that a greater level of journeys will be made using electric vehicles and as such, I would encourage a proportion of the spaces to have EV charging. Building regulations Part S indicates as a minimum, considering the visitor car park alone, that at least one EV charge point should be provided and then a further 8 future proofed with cable routes for charge points.
- Unless there are operational security justifications then the developer should be encouraged to consider climate change adaptation measures. Nature-based solutions to address greater storm rainfall and overheating can also provide a visual betterment, biodiversity net gain and support health and wellbeing. SuDS and tree planting have potential at the site and would be reasonable in light of the expansive hard standing proposed.

Climate change is a central issue to be addressed by the development plan. The direction of travel since its adoption in 2015 is very clear with the Council’s adopted Climate Strategy in 2022 setting a framework for reducing carbon emissions in Wiltshire. Furthermore, the NPPF states that planning needs to shape places in ways that contribute to radical reductions in greenhouse gas emissions.

I support the proposed solar panels.

Date: 30 October 2023

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