Advice from Climate Team to Planning

Reference: PL/2023/09365
Address: Stonehenge Visitors Centre, Winterbourne Stoke, Salisbury, Wilts SP4 7DE
Proposal: Erection of new learning centre building, erection of a re-constructed Neolithic communal structure, retention of existing temporary facilities building and related landscaping works.

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:

- *"Providing for the most sustainable pattern of development that minimises the need to travel and maximises the potential to use sustainable transport."*
- *"Managing development to ensure that jobs and the right infrastructure are delivered at the right time to ensure that out commuting, in particular to areas outside of Wiltshire, is not increased"*
- *"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."***

Paragraph 6.32 sets out that the strategy will contribute to tackling climate change through a number of different areas of policy, such as:

- focusing growth at the larger settlements to help minimise the need for travel,
- ensure new development can withstand future changes in climate and add minimally to carbon emissions,
- provide a network of green infrastructure; and
- ensure more sustainable forms of transport.

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."*

Furthermore, the policy requires non-residential development to achieve the relevant BREEAM 'Excellent' standards.

Additionally, the policy encourages retrofitting measures to improve the energy performance of existing buildings.

The policy concludes by explaining that in all cases the impact of the requirements of CP41 on the viability of the development will be taken into consideration.

Core Policy 60 sets out that *"the council will use its planning and transport powers to help reduce the need to travel particularly by private car, and support and encourage the sustainable, safe and efficient movement of people and goods."* It sets out a number of means to achieve this including planning development in accessible locations, and promoting alternatives to the private car. These aims are further supported by CP61, CP62, CP63, CP64, CP65 and CP66.

In addition, the Wiltshire Core Strategy contains specific policies in relation to **biodiversity (CP50), green infrastructure (CP52), high quality design (CP57), flood risk (CP67)** and **water resources (CP68)**. These all relate to reducing Wiltshire's contribution to climate change and/or adaptation. To be compliant with these policies regard should be had to the implications of the development on climate change. As set out previously climate change is the central issue to be addressed by the development plan.

Other material considerations:

As set out above planning legislation establishes that **other material considerations** should be taken into account in the determination of planning applications. As such, these need to be kept in mind as developments are planned and formulated. Other material considerations may include other local planning policy and guidance, the emerging Wiltshire Local Plan Review, UK government legislation or Written Ministerial Statements and national planning policy and guidance such as the National Planning Policy Framework.

The Council is carrying out a **Local Plan Review**. A draft version has now been approved by cabinet and full council to proceed to the Regulation 19 stage of public consultation. This consultation has commenced. A suite of ambitious new and replacement policies to further reduce Wiltshire's contribution to climate change and foster better community resilience to impacts from climate change are now emerging. 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 seek to make the county carbon neutral by 2030**.

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 (September 2023)** (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."*

Paragraph 154 states that: *"**New development should be planned for in ways that:***
*a) **avoid increased vulnerability to the range of impacts arising from climate change.** When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and*
*b) **can help to reduce greenhouse gas emissions, such as through its location, orientation and design**. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards."*

Paragraph 157 goes on: *"In determining planning applications, local planning authorities should **expect new development to…… take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption**"*

In terms of transport paragraph 104 states that "transport issues should be considered from the earliest stages of plan-making and development proposals, so that….. opportunities to promote walking, cycling and public transport use are identified and pursued".

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 proposal:

The climate team actively and strongly encourages developers of all scales to put the mitigation of and adaption to climate change as a golden theme to run through their development project. This will mean different things depending on the scale of the project, but to support the transition to a low carbon future, radical reductions in greenhouse gas emissions over the existing status quo will be required. I consider that the proposal (certainly the learning centre building) has aligned with this philosophy and as such I support the proposals in principle. My observations are intended to be positive and proactive to encourage the highest possible level of positive climate action to be realised and take learnings from this scheme.

The scheme is relatively modest in scale and I understand falls below a 'major' classification. As such, there is no requirement for a Sustainable Energy Strategy. However, the design and access statement in particular makes numerous references to sustainable construction and explains that a BREEAM Pre-Assessment has been carried out and that the scheme will be targeting BREEAM 'Excellent'. As such, the proposal is on track to comply with CP41.

Since a BREEAM Pre-Assessment has been carried out I would request that it is provided as part of the planning submission.

In terms of operational energy, the information provided is slightly ambiguous about whether the scheme will be net zero carbon in operation or 'very-low-energy'. The information provided explains that a fabric first approach is being taken to ensure low energy demands. It also explains that little heating will be required, but what is needed will be met from an air source heat pump. This is all positive. However, there is no information on how regulated

and unregulated energy needs from the building (or indeed other elements of this scheme including a neolithic classroom and renovation of a temporary building) are to be met.

A net zero carbon in operation strategy should be looking at on-site renewables, preferably building integrated. This is most likely to mean solar PV panels. The existing and proposed flat roof structures would lend themselves well to the provision of solar PBV without impacting on the design aesthetic of the building or this sensitive landscape. Although being placed at 0° is sub-optimal in terms of energy generation, optimisation would remain at around 80% and the potential for power generation would be more evenly distributed through the day. I would welcome comments/revisions from the developer on this suggestion.

In terms of embodied carbon, the scheme again appears to be very ambitious in terms of the learning centre. They have indicated that embodied carbon will be as low as 163kg/m^2 of carbon. I would welcome clarification as to whether this figure is based on the substructure, superstructure and the finishes of the scheme. If so, this is a very low figure and would represent an exemplar for other developers by any metric that I am aware of. I would also welcome information on the embodied carbon impact in relation to the neolithic classroom.

In terms of the retention of the existing temporary building I would welcome any comments the developer has on making investments to retrofit this so as to reduce its operational energy demand balanced with embodied carbon impacts.

Turning to climate change adaptation measures I note the intention to provide a sustainable drainage solution. This is a matter for other colleagues to comment on and secure the necessary allowance for climate change. The other main issue is overheating; the only compliance requirements in regards to this is building regulations and so I cannot offer detailed comment as to whether the proposed strategy is appropriate. However, the climate team support nature-based solutions to climate change adaptation including strategic tree planting to offer shade on and around buildings and areas of hard standing, and using drainage to also help cool such areas.

In conclusion I support the proposals in principle. However, I would request:

- Submission of the BREEAM Pre-Assessment for further comment;
- Clarification on the net zero carbon / low carbon in operation strategy (including use of renewable energy);
- Clarification on whether the embodied carbon figure is based on the substructure, superstructure and finishes;
- Commentary on the thinking in relation to potential retrofit of the repurposed temporary building; and
- Further details on climate change adaptation measures beyond the buildings.

Date: 23 November 2023

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