

Climate Team consultation response

Reference: PL/2023/10495
Address: Elmfield House, Petersfinger, SP5 3BZ
Proposal: Conversion of Elmfield House and outbuildings to 6x dwellings and the erection of 15 dwellings, hard and soft landscaping and associated 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, *“all proposals for major development will be required to submit a Sustainable Energy Strategy alongside the planning application outlining the low-carbon strategy for the proposal”*.

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 been approved by cabinet and full council so proceeded to the [Regulation 19 stage of public consultation](#). The consultation has recently closed and comments are being assessed. 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 (December 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 157 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 159 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 162 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**"

Paragraph 164 is a new insertion into the NPPF at the end of 2023. This states that: "In determining planning applications, local planning authorities should give **significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic**".

In terms of transport paragraph 108 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, Timber in Construction Roadmap, and Powering Up Britain** are very clear. The intentions include:

- More journeys by public transport, walking and cycling;
- More electric cars;
- More sustainable (safe) construction practices; and
- More renewable energy and storage technologies.

Comments on the submission:

Overall: **Objection.**

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.

Whilst the planning history is noted, this related to a scheme that falls below the thresholds in CP41 that require greater consideration of sustainable construction. This proposal is very different in that the number of dwellings being proposed is far greater and the scheme is to be treated as a major development.

Therefore, the proposal must be submitted with a Sustainable Energy Strategy. This should cover issues such as sustainable transport, operational energy, embodied carbon and climate change adaptation. I have reviewed the submission and without prejudice to the developer's explanation of their strategy I do not see any evidence that climate change has even been a consideration to date. They make no mention of the relevant parts of the NPPF for example, a document that needs to be read as a whole. The Sustainable Energy Strategy should be a fundamental document informing their constraints and opportunities work.

Sustainable transport:

There is no Transport Assessment with this proposal, and this is an important document to ensure that the scheme realises all the best opportunities to reduce the reliance on private

vehicle use through active travel and public transport. A section on sustainable transport needs to be summarising this more detailed work and setting it into a climate change context looking at the principles of avoid, shift and improve.

In this context avoid would likely mean that the dwellings are provided with the best possible internet and mobile telecommunications so people do not always need to travel to work, education and shop. The developer needs to look at existing coverage, and if inadequate they will need to consider how they can enhance it.

Shift is about making alternative options to the private car as convenient and as attractive as possible. This will mean having good accessibility into and through the site by understanding where destination facilities are. Then making sure the infrastructure is provided to support these options such as pedestrian and cycle improvements and cycle storage to every home. I cannot see evidence that this has occurred with no convenient links to pedestrian facilities on the A36, and no safe pedestrian pavement provided on Peters Finger Road. Nor can I see information on how cycle storage is being provided to all the homes.

Improve in this context is about considering options such as car clubs and making sure that every home has access to affordable and convenient electric charge points. Electric charge points are easy to provide when parking provision is in curtilage. However, some of the layout will be problematic, especially plots 16-21. These units have parking some distance from the buildings and to provide cabling from the domestic supply to the parking spaces will be costly. This will probably mean that building regulation Part S requirements are exempt, and the future residents will have very expensive retrofit projects in the future/never have access to home electric vehicle charging. We cannot be designing new schemes this way.

Operational energy/carbon:

The developer should be setting out a fabric first approach that produces homes that have very low energy demand. The new buildings should be significantly better than current buildings regulations Part L in terms of fabric performance to meet the climate challenge. The space heating and hot water solutions for all the homes need to be electrified so that the homes are at the very least future-proofed and not reliant on burning fossil fuels on site to provide heat. Heat pumps are most likely the best option for this development and their location needs to be clearly set out on the plan to understand the impacts of this technology in terms of noise and visual impacts.

The developer should be encouraged to provide a scheme that allows roof-mounted solar PV to meet the residual demand for regulated energy and an allowance for unregulated energy. If this is achieved then the developer will be providing operational net zero homes and this is a positive climate action that should be afforded weight in any planning decision, as well as providing the developer with a marketing edge when they look to sell the homes. This approach will also be consistent with the emerging LPR policy on sustainable construction.

A roof plan of the development should be provided, showing that solar arrays can be achieved on the homes to meet energy demand. Technical design will not have taken place so this can be indicative at this stage with a condition to control the final details. However, it's important that this is addressed now so that, as per the NPPF paragraph 159 the design, layout and orientation of the scheme maximises the site opportunities. Ideally large roof slopes, clear of obstruction, orientated within 30 degrees of south should be planned for. It's likely that the overall layout and the orientation and design of a number of plots will need amending to achieve this.

In terms of water efficiency, the recent letter to local authorities from Minister Double highlights that in water stressed locations such as this that a higher water efficiency standard

can be secured of 110l/p/d. When conditioned this higher standard can then be imposed through building regulations Part G. This would improve the sustainability of the development and is a condition that needs to be carried through from the planning history.

Embodied carbon:

It is acknowledged that this is more problematic and that the building industry is only getting to grips with reducing carbon emissions from demolition and construction.

However, it is positive that this scheme will see the reuse of existing buildings which have existing embodied carbon. Much better to use this than demolish and rebuild because this results in even greater carbon emissions. Furthermore, the existing buildings will also be put to a more intense use through the creation of 6 homes, reducing the overall housing demand in the area and the likelihood of more greenfield new builds.

Nonetheless, there are going to be opportunities for the developer to consider their carbon impacts through the approach to construction looking at the substructure, superstructure and the external finishes. For example, the use of low-carbon concrete, less hardstanding and timber will all be positive measures. The developer is encouraged to try and calculate the embodied carbon in line with emerging LPR policy and benchmarking this against good practice, such as the RIBA 2030 Climate Challenge or the LPR standard of no more than 900kg of carbon/m².

Climate change adaptation:

It is inevitable that society will need to deal with the impacts of climate change that will likely include summer overheating, water scarcity and floods.

Taking climate action with nature-based solutions in development can have significant co-benefits. Nature-based solutions include Sustainable Drainage Systems (SuDS), Street trees and SuDS enabled street trees, provision of open space, green roofs and green walls.

Nature-based solutions like these can mitigate climate change through:

- Reducing energy use by insulating and reducing surrounding temperatures; and
- Carbon sequestration

Nature-based solutions like these can help adapt to climate change by:

- Managing and storing water from increased rainfall to avoid flooding; and
- Reducing surrounding air temperatures to prevent overheating.

The co-benefits of these approaches can include improved air quality, better physical and mental health, reduced burden on NHS resources, and support biodiversity.

I have no significant comments to make on this point. However, I would suggest that greater levels of biodiversity net gain should be sought and realised to meet the co-challenge of the ecological crisis, and water butts should be provided to every home as a simple form of water harvesting. The Sustainable Energy Strategy is an opportunity for the developer to explain their consideration here and show the positive action that they have planned.

Conclusion:

In conclusion climate change is the 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 and for making the county resilient to climate change. Furthermore, the NPPF states that planning needs to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The developer should be invited to submit a Sustainable Energy Strategy

taking into account the positive and proactive comments I have provided above then I will be able to offer more informed comment on the specifics of this scheme.

Date: 10 January 2025.

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