Climate Team consultation response

Reference: PL/2023/10608
Address: Barnack Business Centre, Blakey Road, Salisbury SP1 2LP
Proposal: Outline application (including detailed access, scale, layout and appearance) for the erection of two additional floors above the Barnack Centre to provide up to twenty-four residential dwellings (Use Class C3).

Overall: Objection.

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, *"retrofitting measures to improve the energy performance of existing buildings will be encouraged"*. Moreover, *"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 was 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:

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 have reviewed the submission and there is no evidence that this is the case here.

Policy CP41 of the development plan requires the submission of a Sustainable Energy Strategy. This is missing from the submission and that is important because it should be a document that is underpinning how the proposal will mitigate and adapt to the impacts of climate change. The lack of this key document means that the scheme is contrary to the development plan and that I object to the scheme.

This can be addressed through the submission of a Sustainable Energy Strategy that outlines the low-carbon approach being taken to development. I suggest it is set out with a structure following the pillars of Sustainable Transport, Operational Energy/Carbon, Embodied Carbon and Climate Change Adaptation.

To support the developer, I have set out my observations and some positive and proactive comments under those themes.

Sustainable Transport:
There is overlap here with requirements that will be set out by highway colleagues and information provided within the Transport Assessment. It is important to note that the highways team comments filter sustainable transport planners' observations and so tend not to be as ambitious as they might be. I would encourage the developer to be positive and not revert to minimum requirements when they could achieve better outcomes.

I have reviewed the Transport Assessment. This should form the basis of a Sustainable Transport section within the Sustainable Energy Strategy so as to try and minimise carbon emissions associated with movements to and from the development. Having the principles of Avoid, Shift and Improve can be useful.

Avoid means making sure that the site has good quality internet and mobile coverage so that future occupants do not always need to make journeys for leisure, work and education. Where telecommunication services are not good then the developer should seek to address that.

Shift means moving without reliance on private vehicles. The potential for active travel and public transport use is well set out in the submission. Prior to determination I think it would be reasonable to seek more detail on the cycle storage provision because this is an important part of the strategy and seems to be confined to a narrow space on the eastern edge of the site. I think it reasonable to ensure that the high level of cycle provision can be realistically achieved.



East of the site where cycle and bin storage is proposed and unattractive paraphernalia dominate the existing elevation.

Omissions within the submission exist though and the developer should be encouraged to consider retrofitting the existing car park area to provide electric vehicle charge points. They should also be considering opportunities for a car club scheme which might be attractive in an urban location for those that want to travel by car but realise they only need access to this infrequently.

Operational Energy / Carbon:
The strategy for operational energy needs to be ambitious and look to go further than minimum building regulation standards. A fabric first approach should be promoted, and

space heating and hot water demand should be met through an electrified system such as heat pumps. The location of these has an impact on the external appearance of the building and so further details should be provided in the plans. Based on the image of the existing east elevation above its very clear that the architectural plans are not showing the true detail of how this development will look in the street scene. The plans need to show hoe the scheme will look. Paraphernalia needs to be avoided through proper planning.

The final step is to seek to meet the residual energy demand (including an allowance for unregulated energy) through renewable technologies. This is likely to be mean the use of solar panels. The flat roof presents an interesting opportunity to see the best way to achieve this either placing the panels on arrays or possibly flat to the roof. Flat to the roof doesn't optimise electricity generation but does spread the generation more evenly through the course of a day.

I do appreciate that the proposal will not have been through any technical design, so any information provided will be an outline of the strategy and final details will ultimately need to be conditioned. But the point of doing this strategy now is so that there is a clear understanding of what the intended outcomes are to inform the more detailed design work. Targeting net zero in operation would be ambitious and should be afforded positive weight.

The strategy should also consider any retrofitting measures to the existing office building. The construction project will present opportunities to make this building less energy consuming and better adapted to climate change. The NPPF sets out that this ought to be afforded significant weight.

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.

Embodied Carbon:
Dealing is embodied carbon is acknowledged to be more challenging for the development industry than operational carbon. Demolition and rebuild is proven to result in greater levels of embodied carbon than reusing and extending existing assets. As such, it is very positive that the proposal will be making use of the existing building and looking to carry out vertical extensions. This densification of the built environment can be positive as it provides more homes in locations that can reasonably access services and facilities without such reliance on private vehicle use.

In the Sustainable Energy Strategy, I would encourage the developer to provide more information on how they will be seeking to reduce embodied carbon. They can set out comments in relation to minimising embodied carbon through the reuse of the building. But I would encourage them to focus on what else they can do with the vertical construction thinking about the superstructure and external finishes. I suspect there will be a great deal of opportunity here because they will presumably need a relatively lightweight construction and given the mixed-use character of the area there ought to be a lot of flexibility around the external materials.

Climate Change Adaptation:
Climate change is inevitable, and we are already experiencing the impacts of rising global temperatures. Whilst the science telling us that climate change is happening is irrefutable, it is less certain around the pace and magnitude of change, and what the impacts will be. However, we are very likely to experience overheating, more flooding and conversely water

scarcity in the coming years and decades. Development needs to show that it is being planned so that it is fit for its lifetime, in this case probably at least several decades.

Ordinarily I would support a nature-based approach because this results in significant co-benefits beyond climate change such as supporting biodiversity, making more attractive development, addressing air quality and improving health. However, given the specific nature of this scheme options in this regard are limited to potentially the use of green walls and green roofs. I would encourage the developer to consider these options when they are setting out how they will future-proof this development for a changing climate.

Conclusions:
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.

Date: 17 January 2024

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