

Climate Team consultation response

Reference: PL/2024/09976
Address: Land off Southampton Road and Junction Road, Alderbury, Wiltshire
Proposal: Outline planning permission with all matters reserved apart from details of access from Southampton Road, for a residential development of up to 47 dwellings, along with associated public open space, landscaping and biodiversity enhancements and a car park to serve the community allotments

Overall: No objection subject to conditions.

Comments on the submission:

This is an application that is acknowledged to be contrary to CP1 and CP2 of the development plan. Part of the reason for these policies is to address climate change and direct development to the most sustainable locations. However, this is not the only way in which the development plan seeks to address climate change and the policy conflict, so far as it relates to the climate, needs to be balanced with other considerations.

The development has been submitted with a 'Sustainability Statement incorporating Energy Assessment' by envision and dated October 2024. This is a positive document that meets the CP41 policy requirement to provide a Sustainable Energy Strategy that outlines the applicant's approach to delivering a low carbon scheme. CP41 however does not set any particular standards beyond reference to now outdated building regulations. This reflects that the policy was adopted in 2015 and likely written several years prior to that.

The world has moved on and so I support and encourage developers to consider operational energy, embodied carbon, sustainable transport and climate change adaptation within their Strategy. This is exactly what the applicant has done and they have voluntarily committed to meeting emerging Local Plan Review standards that are far more ambitious. In my opinion this ambitious approach needs to be secured through conditions and given positive weight in any planning balance. If secured, then the development will be supporting the development plan's strategic objective of addressing climate change.

Operational energy:

The applicant commits to net zero in operation and based on the current indicative house types and layout they report that net zero can be achieved in terms of regulated energy. They accept that there is a shortfall when they factor in for unregulated energy and commit to offset this. At the time of writing there is no clear mechanism to achieve this offset, but nor are the final house types and layout being approved. I consider it is possible for the layout and house types to be reviewed, as well potentially as some of the fabric first measures, so that an emerging Policy 85 approach can be achieved here without the need for offsetting.

The Strategy is acknowledged to be in outline form, so there is scope for further work and a final Strategy to be conditioned on the basis of the principles set out so far by envision.

Embodied carbon:

The applicant outlines some significant measures and commits to achieving a whole life embodied carbon below 900kgCO₂/m². This accords with emerging policy which is not actually all that ambitious in terms of benchmarking. At this time simply reporting on embodied carbon is the most important act, so that data can be gathered and used to inform future policy work to drive the reduction of greenhouse gas emissions.

Nevertheless, the applicant point to some actions that will reduce embodied carbon associated with this scheme and through the production of an Embodied Carbon

Assessment with any reserved matters application will be able to make informed decisions about what will be most impactful and what could be cost effective too. In short, this is further reason to be positive about the proposals subject to the use of conditions.

Sustainable Transport:

In this area there is less to be enthused by. Whilst I note the accessibility details provided, I consider that this is a location that will be reliant on the private car to a large extent. Building regulations Part S will likely, based on the promotion of in-curtilage parking illustrated, secure EV charging to every home, so that is good. Furthermore, there is commitment to providing policy compliant bicycle storage. As such, this scheme can be considered in relatively neutral terms from a climate perspective in my opinion.

However, I would encourage the developer to provide further assessment at reserved matters stage having regard to the Avoid, Shift, Improve framework and plan the scheme with interventions at all of those levels, such as:

- Avoid – include dedicated space for home working in the units and ensure excellent broadband and telecommunications provision.
- Shift – Provide any commuted sums that highway colleagues request in connection with enhanced active travel and public transport.
- Avoid – Ensure the final layout has planned EV charge points to every home from the metered domestic supply. Explore the inclusion of public charging facilities within the allotment car park which might support existing homes transition to EVs where they do not have the ability to retrofit EV charging at their home.

Climate Change Adaptation.

The developer commits to water efficiency in line with emerging policy that is more ambitious than the existing standard and higher rates in building regulations Part G.

I am also pleased to see consideration of nature-based solutions in the development around those climate change risks of flooding, overheating and water scarcity. Taking climate action in development can have significant co-benefits, especially when nature-based solutions are adopted. 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.

Overheating is also a risk that can be managed through the orientation and layout of the built form. For example, an east/west orientation creates a high risk of overheating because it is very difficult to effectively shade windows from the rising and setting sun. By rotating the building to a north/south orientation, the windows can be effectively shaded (such as vegetation, topography and building design like a roof overhang on the southern elevation).

As set out previously this illustrative layout is not ideal in terms of regulated energy, nor great in terms of climate change adaptation. I think an informative is appropriate to make it clear that the illustrative masterplan is not approved, and that there is support to be had to

develop this work with south oriented buildings clear of obstructions to the roof (as recommended within the Residential Design Guide).

Suggested conditions:

- Prior to the commencement of any development and concurrently with any future reserved matters application(s), updated Sustainable Energy Strategy(ies), including details of [operational energy, embodied carbon, climate change adaptation measures and sustainable transport] shall be submitted to and approved in writing by the Local Planning Authority. This shall accord with the principles set out in the Sustainability Statement Incorporating Energy Assessment by envision dated October 2024. The development shall be carried out in accordance with the approved details.

REASON: To ensure that the objectives of sustainable development set out in policy CP41 and CP57 of the Wiltshire Core Strategy are achieved.

- Prior to the commencement of any development and concurrently with any future reserved matters application(s), an Embodied Carbon Assessment covering at least A1-A5 elements for the substructure, superstructure and finishes in accordance RICS Professional Statement on Whole Life Carbon, 2017 and BS EN 15978:2011 shall be carried out and submitted to and approved in writing by the Local Planning Authority. This Assessment shall set out a final target for the substructure, superstructure and finishes to achieve as well as highlighting avenues where low carbon approaches can be taken on the major elements of the project.

REASON: To ensure that the objectives of sustainable development set out in policy CP41 and CP57 of the Wiltshire Core Strategy are achieved.

- Prior to the commencement of any development and concurrently with any future reserved matters application(s), final details of the low-carbon and renewable energy technologies (such as air source heat pumps and roof-mounted solar PV) shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

REASON: To ensure that the objectives of sustainable development set out in policy CP41 and CP57 of the Wiltshire Core Strategy are achieved.

- Prior to the commencement of any development and concurrently with any future reserved matters application(s), final details of the electric vehicle charging points (including their location, number and manufacturer's details) shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

REASON: To ensure that the objectives of sustainable development set out in policy CP41, CP55, CP57 and CP60 of the Wiltshire Core Strategy are achieved.

- Prior to the commencement of any development and concurrently with any future reserved matters application(s), final details of the cycle parking shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

REASON: To ensure that the objectives of sustainable development set out in policy CP41, CP55, CP57 and CP60 of the Wiltshire Core Strategy are achieved.

- The dwellings shall be constructed to meet, as a minimum, the higher Building Regulations standard Part G for water consumption limited to 110 litres per person per day (l/p/d) using

the fittings approach. Within any updated Sustainable Energy Strategy(ies) updated details of what is to be achieved in relation to water consumption shall be set out targeting the level suggested in the Sustainability Statement Incorporating Energy Assessment by envision dated October 2024 of 85 l/p/d.

REASON: The site is in an area of serious water stress requiring water efficiency opportunities to be maximised, to mitigate the impacts of climate change, in the interests of sustainability and to use natural resources prudently in accordance with the National Planning Policy Framework.

INFORMATIVE: The Illustrative masterplan (Dwg P1365-RHP-ZZ-00-DR-A-1200 P4) contains details of appearance, landscaping, layout and scale that do not help to reduce greenhouse gas emissions through location, orientation and design. As such, this plan shall not be considered as approved at this time. The developer is invited to further proactive and positive discussions with the climate team ahead of any reserved matters submissions. This will facilitate a discussion on practical measures that support the transition to a low carbon future with resilience to climate change.

Date: 5 December 2024

James Taylor BA(Hons) MA MRTPI
Climate Officer, Wiltshire Council

James.taylor@wiltshire.gov.uk - 01225 716727

Context:

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.”*

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 to proceed to independent examination. 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**"*

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.