

Climate Team consultation response

Reference: 20/03641/OUT
Address: Land South of White Horse Business Park, Trowbridge, Wilts
Proposal: Outline application for up to 70 dwellings, landscaping, green infrastructure, associated drainage measures and vehicular access from the A363 as well as all associated works.
Matters to be considered: Access into the site

Overall: No objection subject to conditions and further information on the site access to Woodmarsh Road.

Comments on the submission:

This is a planning application that pre-dates the establishment of the climate team's planning consultation service and presumably has now reached an advanced stage towards determination. I make these comments with this in mind, especially given that there are few hooks to require action, and our team is focused on supporting and encouraging developers to be ambitious.

I have reviewed the Sustainable Energy Statement by Turley Sustainability. It provides an outline of a low carbon strategy for delivering the development that is sufficient to satisfy CP41 requirements in the development plan to form a broadly neutral consideration.

I am pleased to see it follow the structure of operational energy, embodied carbon, sustainable transport and climate change adaptation. The comments in each section are proportionate to this being an outline application with all matters reserved save for access. The scheme might be considered therefore to be at around RIBA Stage 2, so there remains scope for ambitious climate action still. The following comments help to explain the suggested conditions and form brief guidance for future reserved matters details.

Operational energy:

The developer sets out an approach to align the scheme with emerging information on the Future Homes Standard. This is moderately ambitious and most positively will ensure that the scheme will be future proofed for net zero as the grid is decarbonised because they are electrifying the energy requirements. They estimate that this will be a circa 63% uplift against Part L building regulations for carbon emissions. 100% would be net zero (regulated energy - but would not address unregulated energy). They do this through an energy hierarchy approach, and low carbon technologies such as air source heat pumps. This approach will need to be refined in RIBA Stages 3 and 4, so more information should be provided at reserved matters and by condition. That might present an opportunity to be more ambitious and work towards the emerging local plan review net zero standards at Policy 85.

Even based on extant material considerations it is important at reserved matters that the design and orientation of the development takes opportunities to minimise energy consumption in accordance with Section 10: Resources of the Wiltshire Design Guide and Chapter 14 of the NPPF. The December 2024 NPPF is very clear that the need to mitigate and adapt to climate change should be considered in both the preparation and determination of planning applications. I expect to have early engagement with the developer as they move into planning their reserved matters. The illustrative masterplan is not to be considered as approved at this stage as it may prejudice such discussions.

Embodied carbon:

This is a more challenging area for the construction industry and the applicant here makes little comment and commitment. Their suggestions are reasonable but need much more work and consideration. I am happy to help them with that.

A key action they have not committed to and that would show ambition would be to produce an embodied carbon assessment in accordance with emerging Policy 87. This could form an annexe to any future Sustainable Energy Strategy looking at the substructure, superstructure and external finishes (broadly modules A1-A5 of a whole life carbon assessment). Benchmarking this to industry best practice such as the pilot Net Zero Carbon Buildings Standard, LETI, or the RIBA 2030 Climate Challenge would be exemplary. Bettering the emerging LPR standard of 900 kgCO₂/m² would be welcomed as a fallback.

Sustainable Transport:

The framework of Avoid, Shift and Improve is a good way to consider a development like this.

The developer ought to be seeking to help people avoid trips through excellent internet and telecommunication facilities that support home working. They should also be ensuring that all units have dedicated spaces to allow home working for those that can. This can be picked up at reserved matters.

Shift includes supporting future occupiers to use public transport and active travel instead of the private car. The proposed works around the A363 if secured appropriately will go some way in this regard with new bus stops and shelters, as well as new infrastructure for pedestrians and cyclists. However, I can see a missed opportunity in regard to the pedestrian access onto Woodmarsh and associated infrastructure. This is an important active travel link from the site to North Bradley where facilities include the village school. Providing this link will encourage active travel in this direction, reducing the reliance on the private car and supporting retention of village facilities. Currently it appears to be a pedestrian link only, it is not planned, and I can imagine it will be a gravel track. Such routes are not suitable for all users and tend to require significant regular maintenance, often at the expense of a management company funded by future residents.

ACTION: Request further information on the access to Woodmarsh so that it is designed to facilitate both pedestrian and cycle movements with appropriate maintenance safeguarded.

Turning to Improve, this is crucial in a Wiltshire context where there are higher than average levels of vehicle ownership and a reliance on the private car. Therefore, supporting the transition to electric vehicles is a highly impactful action. Part S of the building regulations will go some way to achieving this, but it includes exemptions. If planned well, then any future reserved matters application ought to provide a parking layout to the homes that ensures all homes have access to EV chargers (from the domestic metered supply) at first occupation. However, if poorly planned, then the exemptions will result in homes not having access to cheap charging. I can work with the developer to avoid this in a cost-effective manner at RIBA Stage 3 where the developer will be finalising plans for reserved matters and reviewing the design against building regulations.

Climate Change Adaptation:

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. I see the developer has committed to this which is a neutral consideration.

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 a risk that can be managed through the orientation and layout of the built form. For example, an east/west building orientation creates a high risk of overheating because it is very difficult to effectively shade windows from the rising and setting summer sun. By rotating the building to a north/south orientation, the windows can be effectively shaded from the high summer sun, whilst still allowing passive gain from the lower winter sun. This is all best achieved with east/west building blocks as per the Wiltshire Design Guide.

ACTION: 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. 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), 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), 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), details of the cycle parking and active travel infrastructure routes 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 using the fittings approach. 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 4005 by Turley) contains details of appearance, landscaping, layout and scale that may 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 and, future-proof the development to facilitate occupiers to install low carbon and renewable technologies that make their homes greener and cheaper to run.

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 have adopted the [Wiltshire Design Guide](#) in 2024 which includes useful information on addressing climate change through the design choices in development.

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 in 2025. 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 2024)** (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 161 states: *“The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. 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.”*

The latest version of the NPPF inserts new paragraph 163 making it very clear that addressing climate is the **responsibility of decision-takers and developers** and goes beyond just plan-making: *“The need to mitigate and adapt to climate change should also be considered in preparing and assessing planning applications, taking into account the full range of potential climate impacts.”*

Paragraph 164 states that: *“**New development should be planned for in ways that:**
a) **avoid increased vulnerability** to the range of impacts arising from climate change.
b) help to **reduce greenhouse gas emissions**, such as **through its location, orientation and design.**”*

Paragraph 166 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 167 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”.*

When determining planning applications for **all forms of** renewable and low carbon development paragraph 168 is clear that local planning authorities should:

- not require applicants to demonstrate the overall need and *“give **significant weight** to the benefits associated with renewable and low carbon energy generation and the proposal’s contribution to a net zero future”*; and
- recognize that even small-scale and community-led projects provide a *“**valuable contribution** to cutting greenhouse gas emissions”*.

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 **Clean Power 2030 Action Plan, 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.

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