



Damask Way, Warminster

Energy and Sustainability Statement

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1 Introduction

1.1 Introduction

- 1.1.1 Erban Consulting Limited was instructed by Backhouse Housing to prepare an energy and sustainability statement to support the outline planning application for the proposed development at Damask Way, Warminster.
- 1.1.2 The purpose of this report is to demonstrate that the proposed development would meet high standards of sustainable design and construction throughout all stages of the development, including construction and operation. The development would adopt measures to maximise the efficient use of resources, adapt to the risks associated with climate change, and manage pollution.

1.2 Development description

- 1.2.1 Outline planning permission for residential development of up to 49 dwellings with associated access, parking, internal roads, public open space, landscape planting, ground level re-profiling and associated infrastructure and works. All matters reserved except for access.

2 Legislation, Policy and Guidance

- 2.1.1 The following national and local planning policy guidance have been considered in applying the sustainable design and construction standards for the development.

2.1 National: National Planning Policy Framework (NPPF) (December 2024)

- 2.1.1 The *National Planning Policy Framework (NPPF)* was designed to simplify and clarify planning policy and to make the planning system more accessible. It details the government's view of what sustainable development in England means in practice and states that there are three objectives to sustainable development:
- **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 2.1.2 The following are extracts from the NPPF which have been referenced due to their relevance to this report. They relate to the need for planning applications to mitigate and adapt to climate change.

Paragraph 164

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 incorporating green infrastructure and sustainable drainage systems; and

b) help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings in plans should reflect the Government's policy for national technical standards.

Paragraph 166

In determining planning applications, local planning authorities should expect new development to:

a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and

b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

2.2 Local: Wiltshire Core Strategy (January 2015)

- 2.2.1 The *Wiltshire Core Strategy* contains several policies that relate to sustainable design and construction. These include policies on sustainable construction and low-carbon energy (Core Policy 41), green infrastructure (Core Policy 52), high quality design (Core Policy 57), sustainable transport (Core Policy 60), flood risk (Core Policy 67), and water resources (Core Policy 68).

2.3 Local: Wiltshire Local Plan Pre-Submission Draft 2020-2038 (September 2023)

- 2.3.1 Wiltshire Council submitted the *Wiltshire Local Plan* to the Secretary of State for Housing Communities and Local Government for independent examination on 28 November 2024. The plan sets out Wiltshire Council's strategic vision for the delivery of sustainable development up to 2038. It includes economic, social and environment policies to encourage new developments to mitigate and adapt to climate change. The *Wiltshire Local Plan* is not to proceed and therefore very little weight has been given to this document.

2.4 Local: Warminster Neighbourhood Plan 2015-2026 (November 2016)

- 2.4.1 The *Warminster Neighbourhood Plan* encourages new homes to take account of sustainable standards, specifically encouraging new homes to take account of the Code for Sustainable Homes. Because the Code for Sustainable Homes was withdrawn in 2015, the document has had limited influence on the application of sustainable design and construction standards, although its policies have been considered where relevant.

2.5 Local: Warminster Neighbourhood Plan 2 Pre-Submission Draft 2026-38

- 2.5.1 The *Warminster Neighbourhood Plan 2* has just finished consultation. It contains several policies that address the challenges of climate change in Warminster. The document is considered to carry limited weight as it is at an early stage.

3 Methodology

3.1.1 This statement will be structured to address the following aspects of sustainable design and construction:

- Resource management: Sustainable travel, energy and carbon dioxide emissions, water efficiency, materials (including reuse of waste), nature conservation and biodiversity.
- Climate change adaptation: overheating, resilient foundations, flooding and surface water management.
- Pollution management: contaminated land, air pollution, control of dust and emissions, noise pollution, light pollution, water pollution.

3.1.2 In doing so, it will respond to the policies of the *Wiltshire Core Strategy* and the *Warminster Neighbourhood Plan* that require new developments to mitigate and adapt to climate change.

4 Resource management

4.1 Sustainable travel

Proximity to amenities

- 4.1.1 A wide range of amenities are located within walking distance (less than 2km) and cycling distance of the development site including primary schools, recreational areas, supermarkets, a retail park, a gym, a doctor's surgery, pubs, and a community hospital.
- 4.1.2 The development site is situated within proximity of an extensive local Public Right of Way (PRoW) network. The WARM53 PRoW footpath routes through the site providing connection to several different PRoW footpaths within the Smallbrook Meadows Nature Reserve and Warminster Lake Pleasure Grounds area. Access to the WARM53 PRoW footpath would be retained and upgraded as part of development proposals. In addition, a pedestrian connection is proposed to connect the development site to the local pedestrian network on Damask Way.
- 4.1.3 The development site is situated within proximity of local cycle routes, as well as National Cycle Route 24, which provides a western route to Frome, Radstock and Bath, and an eastern route to Salisbury and Southampton.
- 4.1.4 The development site's connection to the extensive local pedestrian and cycling networks, alongside its proximity to amenities, promotes active and sustainable travel and reduces the reliance on car travel.
- 4.1.5 Further details are provided in the submitted *Transport Statement*.

Access to low carbon transport nodes

- 4.1.6 Avon Road bus stop is the closest bus stop to the proposed development, situated approximately 650m from the site. It is serviced by the number 50 bus providing a low carbon means of travel to Warminster Town Centre. Additional bus services are available from bus stops on the B3414 Boreham Road, which include the Highbury Park (eastbound) and Esso Garage (westbound) stops, located approximately 1.5km and 1.6km from the centre of the site. These bus stops are serviced by the D1, 24 and 57 buses, providing access to prominent local destinations such as Westbury, Trowbridge, Bradford on Avon, Bath, and several other key local areas of employment.
- 4.1.7 Warminster Railway Station is approximately 1.8km from the site. The station is on the Wessex Main Line and provides frequent and direct services to several prominent locations such as Bristol Temple Meads, Bath Spa, London Waterloo, Salisbury, Cardiff Central, and Portsmouth Harbour.
- 4.1.8 According to the Department for Transport's *Connectivity Tool*, the development site's connectivity lies within the top 10% for walking, cycling and public transport within Wiltshire. This illustrates the sustainable nature of the development location from a transport perspective.
- 4.1.9 Further details are provided in the submitted *Transport Statement*.

Cycle storage

- 4.1.10 To assist in the reduction of car journeys, secure and convenient storage for bicycles would be provided to each dwelling in accordance with relevant local standards.

Electric vehicle charging

- 4.1.11 Electric vehicle charging points would be provided to each dwelling to facilitate the use of electric vehicles, in accordance with Approved Document S.

Homeworking

- 4.1.12 Each dwelling would be provided with high speed digital connection and would be designed with space that could function effectively for homeworking to reduce the need to travel where possible.

4.2 Energy and carbon dioxide (CO₂) emissions

Reducing energy consumption and operational carbon emissions

- 4.2.1 There is a commitment to reduce operational energy consumption and carbon dioxide (CO₂) emissions at this development by constructing in accordance with the energy hierarchy:
- i. Reduce the energy load of the development.
 - ii. Maximise the energy efficiency of the fabric.
 - iii. Deliver on-site low carbon or renewable energy systems

Reducing the energy load of the development

- 4.2.2 To reduce the energy load of the development, dwellings are to be designed with relatively simple forms, and to benefit from solar gain as far as is practical through the following design measures:
- Buildings have been spaced so that they don't overshadow one another.
 - All dwellings are to be designed with windows on at least two elevations.
- 4.2.3 Measures would be taken to reduce the risk of overheating and avoid the need for active cooling. Internal heat generation would be minimised by:
- Insulating all hot water pipes beyond Building Regulation standards;
 - Installing 100% low energy lighting; and
 - Installing energy efficient equipment where applicable.
- 4.2.4 Heat entering the plots would be minimised through:
- High levels of insulation; and
 - Specifying glazing with a solar transmittance value that has been carefully considered to strike the balance between useful solar gain in the winter and unwanted solar gain in the summer.
- 4.2.5 Passive ventilation would be designed for by:
- Including openable windows to all rooms; and
 - Providing cross-ventilation.

- 4.2.6 In addition, the inclusion of gardens and green spaces would lower temperatures around the dwellings.

Maximising the energy efficiency of the fabric

- 4.2.7 Table 1 details the anticipated fabric specification to the dwellings. The second column in this table sets out Approved Document L 2021 limiting fabric parameters to show the elements of the specification that would provide an improvement. The anticipated specification incorporates low U-values, a low air leakage, and good thermal bridging. The specification is subject to change.

Table 1: Anticipated fabric specification to the dwellings

	Approved Document L 2021 limiting fabric parameters	Anticipated fabric specification
U-value of external walls	0.26 W/m ² K	0.20-0.22 W/m ² K
U-value of ground floors	0.18 W/m ² K	0.10-0.12 W/m ² K
U-value of roofs	0.16 W/m ² K	0.11-0.16 W/m ² K
U-value of doors	1.60 W/m ² K	1.00 W/m ² K
U-value of windows	1.60 W/m ² K	1.20 W/m ² K
Air permeability	8 m ³ /h.m ² at 50 Pa	4 m ³ /h.m ² at 50 Pa
Thermal bridging	Default ψ value of 0.200	The use of calculated details to reduce heat loss through junctions

Delivering on-site low carbon or renewable energy systems

- 4.2.8 It is anticipated that energy demand and CO₂ emissions would be further minimised through the installation of electric heat pumps. There is sufficient space both within and around the dwellings for the installation of heat pumps.
- 4.2.9 The installation of solar photovoltaic (PV) panels would be considered to further reduce energy consumption.

Reducing peak energy demand

- 4.2.10 A smart meter and an energy display device would be provided to display fuel consumption data to occupants of each dwelling. This would allow the occupants to better understand the energy implications of the way they occupy and use their home. The installation of smart meters would enable the dwellings to take advantage of demand side response and information on smart appliances would be provided to the occupants.

4.3 Water efficiency

Water saving appliances

- 4.3.1 Water usage in each dwelling would be restricted by:
- Installing low flush toilets;
 - Installing low capacity baths;
 - Installing flow restrictors on the taps and showers to reduce flow rate; and
 - Where applicable, installing water efficient white goods.

Water metering

- 4.3.2 Each dwelling would be provided with a water meter to allow it to be individually metered.

4.4 Materials (including reuse of waste)

Choice of materials and embodied

- 4.4.1 The use of materials with higher levels of recycled content, such as reclaimed roof tiles and recycled aggregate, would be considered prior to the specification of new materials.
- 4.4.2 Materials with a low environmental impact would be chosen with at least three of the following five key elements of the building envelope achieving a rating of A+ to D in the BRE *Green Guide to Specification*:
- Roof
 - External walls
 - Internal walls
 - Upper and ground floors
 - Windows
- 4.4.3 100% of the timber would be responsibly sourced and the majority of the remaining materials would be sourced from companies with certification to a responsible sourcing scheme. Where practical, materials would be sourced locally and would be robust, low maintenance and long lasting. The use of materials or products that produce volatile organic compounds or formaldehyde would be avoided wherever possible. All insulation would have a global warming potential (GWP) of less than or equal to 5.
- 4.4.4 Where practical, building elements would be constructed with the prospect of future deconstruction, facilitating the segregation and extraction of materials that could be carefully removed intact during redevelopment, and reused and recycled.

Minimising waste during construction

- 4.4.5 To minimise waste on site, a site waste management plan would be prepared that contained:
- Target benchmarks for resource efficiency set in accordance with best practice;
 - Procedures and commitments to minimise non-hazardous construction waste;
 - Procedures for minimising hazardous waste; and
 - The monitoring, measuring and reporting of hazardous and non-hazardous site waste production according to the defined waste groups.
- 4.4.6 In the first instance, waste would be re-used on site in situ or for new applications. Where it is not possible to recycle waste for use on site, where practical waste would be either:
- Re-used on other sites
 - Salvaged/reclaimed for re-use
 - Returned to the supplier via a 'take-back' scheme
 - Recovered and recycled using an approved waste management contractor
 - Composted
- 4.4.7 Where waste is unavoidable, it would be treated and disposed of in an environmentally acceptable manner.

Minimising waste during occupation

- 4.4.8 Space would be provided for bins to enable the segregation, storage and collection of recyclable waste. The occupants would be provided with information on recycling and would be encouraged to recycle through provision of space for internal recycling bins.

4.5 Nature conservation and biodiversity

Retention of existing green infrastructure and its potential improvement

- 4.5.1 Most of the existing trees at the development site would be retained. The removal of three trees (G1.1, G1.2, and T16) and one tree group (G21) is proposed, although their removal would be compensated by the implementation of a tree replacement strategy. The impact that the removal of trees has on the amenity value of the development site is likely to be short-term, whilst the replacement planting matures sufficiently to replace and enhance the value. Further details are provided in the submitted *Arboricultural Impact Assessment*.
- 4.5.2 Several ecological receptors at and around the development site have been identified, including:
- nature conservation designations within the Zone of Influence of the site;
 - habitats on-site of intrinsic nature conservation value (acidic grassland, broadleaved woodland);
 - bat commuting/foraging habitat; and
 - a low population of Grass Snake.
- 4.5.3 To avoid any significant ecological impacts, and achieve $\geq 10\%$ Biodiversity Net Gain, the proposals would:
- be phosphorus neutral;
 - provide recreational space on site, as well access to the nearby town park;
 - protect and buffer the acidic grassland and broadleaved woodland;
 - provide a dark vegetated buffer to the woodland edge to maintain a coherent network of bat habitat connected to the wider landscape;
 - provide amphibian connectivity across the site;
 - create and enhance habitats to increase the extent and diversity of higher value habitats present on site e.g. extent of acidic grassland and tree planting; and
 - provide integrated bat and swift boxes in the new dwellings.
- 4.5.4 Further details are provided in the submitted *Ecological Impact Assessment*.

5 Adapting to climate change

5.1 Overheating

5.1.1 Measures would be taken to reduce the risk of the dwellings overheating. Internal heat generation would be minimised by:

- Insulating all hot water pipes beyond Building Regulation standards;
- Installing 100% low energy lighting; and
- Installing energy efficient equipment where applicable.

5.1.2 Heat entering the buildings would be minimised through:

- High levels of insulation; and
- Specifying glazing with a solar transmittance value that has been carefully considered to strike the balance between useful solar gain in the winter and unwanted solar gain in the summer.

5.1.3 Passive ventilation has been designed for by:

- Including openable windows to all rooms; and
- Providing cross-ventilation.

5.1.4 These measures mean that the dwellings would be at reduced risk of overheating.

5.2 Resilient foundations

5.2.1 Foundations would be designed and constructed to be resilient taking into account their performance in extreme weather conditions.

5.3 Flooding and surface water management

5.3.1 The proposed development including dwellings, access roads and drainage infrastructure would be fully located within Fluvial Flood Zone 1 and at low risk of fluvial flooding. The site would not be affected by current or anticipated future risk of flooding from other potential sources including Surface Water, Tidal, Groundwater, Existing, Proposed or Artificial Infrastructure for the lifetime of the development.

5.3.2 The proposed drainage system and SuDS strategy for the management of surface water generated from the proposed development would ensure that there is no increase in the risk of flooding to both the development and offsite properties and land.

5.3.3 Further details are provided in the submitted *Flood Risk Assessment & Drainage Strategy*.

6 Pollution management

6.1 Contaminated land

- 6.1.1 Contamination, if found, would be suitably addressed.

6.2 Air pollution

- 6.2.1 It is anticipated that heat pumps would be installed to reduce air pollution associated with heating the dwellings. Heat pumps have no point of use emissions such as Nitrogen Oxides (NOx) or Sulphur Oxides (SOx).
- 6.2.2 The specification of electric vehicle charging points aims to reduce transport related emissions by facilitating the use of electric vehicles. Road traffic impacts associated with the operation of the proposed development can be considered as having an insignificant effect on local air quality with regard to relevant human receptors, no likely significant effect on the River Avon Special Area of Conservation (SAC), no adverse effect on the River Avon System Site of Special Scientific Interest (SSSI), and an insignificant effect on the Smallbrook Meadows Local Nature Reserve (LNR). Further details are provided in the submitted *Air Quality Assessment*.

6.3 Control of dust and emissions

- 6.3.1 Measures that align with the Institute of Air Quality Management's *Guidance on the Assessment of Dust from Demolition and Construction* would be applied to control dust and PM₁₀ emissions. Further details are provided in the submitted *Air Quality Assessment*.

6.4 Noise pollution

- 6.4.1 The noise limit for construction noise would largely be met at the nearest noise sensitive receptors assessed if a 2.5m high hoarding were installed around the perimeter. With the implementation of a Construction Environmental Management Plan, noise levels may be reduced by up to 5 db(A). Additional measures to minimise noise in relation to the selection of specific plant items are provided for consideration in the submitted *Construction Noise and Vibration Assessment*.
- 6.4.2 Noise within the development would be managed by providing glazing and ventilation measures capable of meeting the relevant noise criteria inside habitable rooms. Further details are provided in the submitted and *Noise Impact Assessment*.

6.5 Light pollution

- 6.5.1 The proposed lighting strategy would minimise impact on ecology and neighbouring residences. To minimise habitat disturbance, the proposed design would achieve 0.5lux or less in areas identified as being ecologically sensitive. In addition, luminaires would be chosen that offer minimal ULOR, utilise Dark Sky properties and have correct optic to minimise light spill into unwanted areas. The proposed lighting control strategies would limit lighting to when it is required and avoid unnecessary lighting pollution. Further details are provided in the submitted *Lighting Impact Assessment*.

6.6 Water pollution

Surface water pollution

- 6.6.1 The proposed surface water drainage system would ensure surface water from impermeable areas would receive an appropriate level of treatment to remove pollutants and contaminants prior to discharge to the receiving waterbody. Further details are provided in the submitted *Flood Risk Assessment & Drainage Strategy*.

Control of water pollution during construction

6.6.2 Contractors would minimise water pollution by undertaking the following measures as appropriate:

- Incorporating oil separators;
- Incorporating clear marking/signage of drainage systems;
- Correcting wrong connections to the drainage systems;
- Bunding of chemical, fuel and oil delivery storage areas; and
- Designating and bunding of areas for cleaning activities.

7 Conclusions

- 7.1.1 The proposed development at Damask Way would provide energy efficient, healthy, and sustainable housing. The development site is sustainably located with a wide range of services, facilities and amenities within walking and cycling distance. The development would encourage the prudent use of natural resources by minimising energy and water use and by utilising responsibly sourced materials with a low environmental impact where practical. Waste and pollution would be minimised throughout the construction and operation of the dwellings, and measures such as passive cooling design and SuDS would be adopted to mitigate and adapt to climate change.