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# Sustainable Energy Strategy

Land off Storridge Road, Westbury

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# 1 INTRODUCTION

## 1.1 Scope of the Statement

- 1.1.1 This Energy and Sustainability Statement has been prepared to accompany the outline planning application made by Gladman Developments Ltd for the development of Land off Storridge Road, Westbury ('the site'). The description of development is as follows:

***"Outline planning application for the demolition of numbers 5 and 6 Storridge Road and the erection of up to 165 dwellings (including affordable housing), with public open space, structural planting, landscaping, sustainable drainage system (SuDS) and vehicular access point. All matters reserved except for means of access".***

- 1.1.2 Sustainability and climate change have been leading considerations in the preparation of the outline planning application. Further detail on the site and the proposed development is available in the Design and Access Statement and Planning Statement, both submitted as part of the planning application.
- 1.1.3 This Statement establishes a framework of principles and measures that can be developed further at the detailed design stage to ensure a residential development that is sustainable, energy efficient and resilient to climate change. It also demonstrates that the proposals positively respond to the requirements of the National Planning Policy Framework and the development plan, including policy Core Policy 41: Sustainable Construction and Low Carbon Energy.

## 2 POLICY AND REGULATORY CONTEXT

### 2.1 National Policy

- 2.1.1 Sustainability, energy efficiency and climate change are matters addressed within policy and regulation at a national and local level.
- 2.1.2 At the national level, the Climate Change Act 2008 sets legally binding targets to reduce the UK's greenhouse gas emissions. In 2019, the Climate Change Act 2008 was amended to target net-zero carbon emissions by 2050.
- 2.1.3 The Building Regulations set out rules and standards governing the design, construction and alteration of buildings. Part G (Sanitation, hot water safety and water efficiency), Part L (Conservation of fuel and power), Part F (Ventilation), Part O (Overheating) and Part S (Infrastructure for charging electric vehicles) of the Building Regulations and their associated Approved Documents are of particular relevance to the proposals.
- 2.1.4 In January 2021, the Government published the outcome of the Future Homes Standard consultation, later renamed the Future Homes and Building Standard. The Future Homes and Building Standard requires new-build homes to be future-proofed with low-carbon heating and high levels of energy efficiency. It aims to ensure that new homes built from 2027 will produce 75-80% less carbon emissions than homes built under previous Building Regulations. It is expected that Future Homes Standard legislation will be laid by December 2026, followed by a transition period ending in all new homes having to meet the Future Homes Standard by December 2027.
- 2.1.5 To meet this aim, updated Parts F and L of the Building Regulations were introduced at the end of 2021. The updated Part F introduced new standards for ventilation while Part L set out minimum energy efficiency performance targets for buildings, airtightness requirements and improved minimum insulation standards. These updated Building Regulation standards have applied to new homes built since 2022.
- 2.1.6 The National Planning Policy Framework (NPPF) (2024) pp. 7-8 states:

*"The purpose of the planning system is to contribute to the achievement of sustainable development. ... Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

- **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."

## 2.2 Local Policy

- 2.2.1 At a local level, Core Policy 41 of the adopted Wiltshire Core Strategy (2015) states that:

*New development... 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*

**2.2.2** The policy sets out criteria that all new development is expected to achieve, in line with national standards, detail of which will be secured on this proposed development at the reserved matters stage.

## ENERGY AND SUSTAINABILITY STRATEGY

### 2.3 Background

- 2.3.1 A framework of sustainability and energy efficiency principles and measures to be developed further at the detailed design stage is outlined below. As already referred to earlier in this Statement, the application is submitted in outline and matters relating to appearance, design, layout and landscaping, among others, are reserved for subsequent consideration. The exact specifications of energy and sustainability measures to be incorporated into the development will be provided at the detailed design (reserved matters) stage.

### 2.4 Accessibility and Location

- 2.4.1 The site is located on the north western edge of the town of Westbury. It is well related to the existing built form of Westbury and would provide a logical extension to the settlement. The site represents a suitable and sustainable location to deliver a high-quality residential development that could be successfully integrated into the existing settlement and surrounding landscape.
- 2.4.2 Westbury has a number of local facilities and services that are within easy walking and cycling distance of the site including a convenience store/Post Office, the Railway Inn Public House and Westbury Train Station. Active travel would be a realistic option for residents living at the site with day-to-day needs able to be met in Westbury. Tables 5.2 and 5.3 of the Transport Assessment show the walking and cycling distances to services and facilities from the site, highlighting its sustainable location.
- 2.4.3 The site's access strategy, particularly with regards to its permeability for pedestrians, maximises the potential for the attractiveness of travel via sustainable modes by providing convenient connections along natural desire lines.
- 2.4.4 There are opportunities for bus travel near to the site. There are existing bus services that call at stops on The Ham, Slag Lane and Station Approach. The D1 bus service provide 14 services per day between Bath and Warminster.

2.4.5 The nearest railway station to the site is in Westbury, within walking distance, which provides services to Trowbridge, Bath, Bristol Temple Meads and London Paddington.

2.4.6 The Travel Plan sets out measures to reduce car travel by future occupiers of the site and alternative modal choices that are more sustainable (such as walking, cycling, public transport, and car share). It is expected that the measures contained in the Travel Plan will be developed further at the detailed design stage.

2.4.7 Overall, the site is situated in a sustainable location where many services and facilities can be accessed via the use of sustainable modes of transport.

## 2.5 Design and Construction

2.5.1 The submitted Design and Access Statement demonstrates how the proposals have been shaped by a sustainable landscape-led approach. Due regard and appreciation have been given to the local context, character, vernacular and setting of the area. The use of planning conditions at the outline planning stage can be used to secure the implementation of good environmental and sustainable practices.

2.5.2 It is expected that all dwellings will meet Building Regulation requirements for carbon emission and fabric efficiency and incorporate water and energy efficiency measures, modern standards of insulation and other measures designed to minimise natural resource usage and greenhouse gas emissions.

2.5.3 Other measures that can be implemented during the development of the detail design of the proposals and the construction process are:

- Minimising materials;
- Using locally sourced or recycled materials where possible;
- Using materials with low-embodied carbon content;
- Reducing energy and water during construction;
- Reducing waste and recycling; and

- Enabling low energy and water demand once properties are occupied.

**2.5.4** It is expected that the construction of the development will not take place until a Construction and Environmental Management Plan (CEMP), or similar, has been submitted to and approved by the local planning authority. The CEMP will be implemented during the construction of the proposed development and will include measures to manage risks associated with the production of pollution and potential risks this may pose to water, soils, air and human health. It is anticipated that the CEMP will incorporate a series of management plans that will include, but not be limited to, a water management plan, site waste management plan, traffic management plan, noise management plan, bird protection plan and habitat management plan.

**2.5.5** In terms of flood risk, the proposed drainage scheme comprises the use of a sustainable urban drainage system to manage surface water in a sustainable manner. A surface water detention basin located in the north of the site will form the main attenuation feature within the development. The basin will discharge to the watercourse flowing along the site's north western boundary at greenfield rates. This will provide a betterment in run-off when compared to existing undeveloped conditions where run-off is uncontrolled across all return periods. The development will be safe and not increase flood risk elsewhere.

**2.5.6** New homes should be designed to limit the amount of water used in the property. Approved Document G of the Building Regulations provides guidance on the supply of water to a property, including water safety, hot water supply, sanitation and water efficiency. In essence, the aim is to ensure that all properties have an easily accessible water supply that does not incur wastage. Part G2 limits water consumption within new dwellings to 125 litres per person per day.

**2.5.7** At the outline planning stage, the exact specification of water fittings within residential properties cannot be determined. It is expected, however, that water efficiency technologies, such as water-efficient taps, low-flush toilets and low-flow showers, will be incorporated into the properties. Such technologies will contribute to achieving a water-efficient development. Further, it is proposed that the

development will achieve a water usage of no more than 125 litres per person per day. The applicant will work with the Council to ensure appropriate planning conditions relating to water efficiency and usage are applied to the outline planning permission.

## 2.6 Tackling Climate Change

2.6.1 The causes and effects of climate change are complex, nuanced and difficult to predict. One key consequence of climate change for existing and future residential dwellings is expected to be an increase in the risk of overheating in homes. Homes typically overheat when heat gains from the outdoors and/or generated indoors exceed the heat lost over a prolonged period.

2.6.2 The following measures could be employed to reduce overheating:

- Minimisation of internal heat generation through energy efficient design, including:
  - o Minimising heat gain from lighting by using energy-efficient lighting design solutions.
  - o Maximising the availability of natural light by optimising the light transmittance of the façade's glass elements.
  - o Utilisation of air-source heat pumps for heating and hot water.
- Reducing the amount of heat entering the building in the summer, including:
  - o Limiting the amount of glazing on the dwellings' facades to mitigate solar heat gain while optimising daylight penetration.
  - o Specifying glazing with a low g-value to minimise the amount of solar heat transferred through the facades' glazed elements.
- Using exposed thermal mass and high ceilings within the dwellings to manage heat, including:
  - o Designing dwellings to have high ceilings to encourage stack ventilation.

- Passive ventilation, including:
  - o Openable windows to provide a passive ventilation strategy that utilises cross flow ventilation to maximise the potential for natural ventilation within the dwellings.

## 2.7 Energy Efficiency

2.7.1 The approach taken to achieving energy efficiency and emission savings across the proposed development is expected to accord with the application of the energy hierarchy. This hierarchy is a tiered approach with reductions from using less energy being sought as the first step followed by measures to use energy more efficiently and finally using renewable and low-carbon energy to displace more carbon-intensive energy supply.

2.7.2 The tiers of the Energy Hierarchy are:

- Be Lean – Use Less Energy
- Be Clean – Supply Energy Efficiently
- Be Green – Use Renewable Energy

2.7.3 Use of the energy hierarchy is widely accepted, and it is increasingly seen as a sensible and pragmatic approach to achieving tangible energy improvements across new development.

## 2.8 Be Lean – Use Less Energy

2.8.1 The first tier of the Energy Hierarchy is “Be Lean”. This encompasses measures intended to reduce emissions that are inherent in a building’s design, specification, construction and operation.

2.8.2 As the planning application is submitted in outline only, with all matters except for access reserved for future consideration, the final design and construction arrangements for the scheme are not yet fixed.

- 2.8.3** It is expected, however, that the use of modern methods of construction on the site will be fully explored and where possible and appropriate to do so will be used. Modern methods of construction are widely regarded as being important in assisting with improving construction efficiency and overall energy performance of dwellings while reducing material wastage associated with the construction process.
- 2.8.4** The orientation of the dwellings and overall site layout is also anticipated to be refined at the detailed design stage to optimise passive gains and meet design criteria for overheating and cooling. Achieving an optimised design will aid in reducing requirements for artificial lighting and active heating and cooling, thereby minimising emissions.
- 2.8.5** Natural ventilation will also be promoted throughout the development through the provision of openable windows on the dwellings' facades. Where possible, dwellings will be designed to incorporate dual aspect provision to facilitate natural cross ventilation. Opportunities to provide higher floor-to-ceiling heights and high-level vents will similarly be explored to aid natural cross ventilation.
- 2.8.6** The thermal performance of the dwellings' fabric will also be a key part of ensuring an energy-efficient scheme. High performance materials with a low U-value will be utilised wherever possible. The U-values proposed for this development will meet or exceed those specified in the Building Regulations applicable at the commencement of construction.
- 2.8.7** Emission reductions associated with the proposed development are not considered in detail as part of the submission, as the detailed design is not yet fixed. It is anticipated that this will be explored in greater detail at the reserved matters stage.
- 2.8.8** It is expected that all dwellings will incorporate 100% low-energy lighting. This will reduce the energy required to light the dwellings, thereby reducing emissions and aiding overheating provision by lowering additional sources of heat from the development. While the provision of domestic appliances and white goods will likely be the responsibility of the individual homeowners or tenants, and not the developer, a preference for energy-efficient technology will be assumed. Steps will be taken to

provide information to new residents on the advantages of energy-efficient appliances.

- 2.8.9 Smart meters for electricity and heating will be presumably installed in every dwelling. Such devices will aid residents in reducing their energy consumption.

## 2.9 Be Clean – Supply Energy Efficiently

- 2.9.1 The potential for the proposed development to incorporate a low-carbon heating system will be explored at the reserved matters stage.

## 2.10 Be Green – Use Renewable Energy

- 2.10.1 Opportunities to install renewable energy technologies into the development will be explored at the reserved matters stage.

- 2.10.2 Below is a list of low-carbon and renewable technologies that where possible and appropriate to do so, may be installed to supply a proportion of the energy demand of the proposed development, thus reducing its operational emissions.

- Solar Photovoltaic (PV) – the use of solar photovoltaic panels can displace and reduce requirements for grid electricity and be used for lighting, electric vehicle charging and other electrical appliances. Solar PV Panels will be a requirement to meet Future Homes Standard from 2027.
- Solar Thermal – solar thermal devices can be used to generate hot water.
- Heat Pumps – Ground-Source Heat Pumps (GSHP) and Air-Source Heat Pumps (ASHP) work by absorbing heat from the ground or air to provide low carbon heating. Heat pumps will be a requirement to meet Future Homes Standard from 2027.
- Wastewater Heat Recovery – a wastewater heat recovery system extracts heat typically from wastewater, such as showers or sinks, to heat warm incoming mains water, thus reducing heating demands.

**2.10.3** In addition to the above and in line with Part S of the Building Regulations, an electric vehicle charging point will be provided for all dwellings with an associated car parking space.

### 3 SUMMARY

- 3.1.1 This Energy and Sustainability Statement has been prepared in support of an outline planning application for up to 165 dwellings on Land off Storridge Road, Westbury.
- 3.1.2 The application is submitted in outline only, with all matters reserved for future determination except for access. As such, at this outline stage, there is no fixed sustainability and/or energy strategy for the development. The final strategy will be determined at the reserved matters stage.
- 3.1.3 A key challenge in tackling and responding to climate change in the design and construction of dwellings is combatting the increased risk of overheating. A number of proposed measures have been outlined in this Statement that could be utilised to aid in ensuring that the future dwellings do not overheat. Such measures will also contribute to reducing the energy demands and emissions of the dwellings.
- 3.1.4 The Energy Hierarchy is a tiered approach with reductions from using less energy being sought as the first step followed by measures to use energy more efficiently and finally using renewable and low-carbon energy to displace more carbon-intensive energy supply.
- 3.1.5 Opportunities to reduce energy consumption and utilise robust renewable and/or low-carbon heat technologies will be fully considered at the reserved matters stage. Where possible and appropriate to do so, it is expected that low-carbon heating technologies and renewable energy technologies will be installed throughout the development.
- 3.1.6 The outline planning application aligns with the principles of sustainable development and the policy requirements of the NPPF and development plan.

