Wiltshire Council
LOCAL PLAN
Looking to the future

Addressing Climate Change and Biodiversity Net Gain through the Local Plan
Consultation Response Form

Section Two – Questions

Consultation Question A1: Land-use policies need to be evidence based, realistic, viable and achievable. Is it reasonable to assume that the Local Plan can deliver outcomes that significantly reverse existing carbon emission trends before 2030?

Answer:

Winsley Parish Council lauds the Local Plan for recognising that land-use policies could help to reverse trends in carbon emissions but believe that reversal of those trends can only occur in an integrated way and not in isolation.

Consultation Question A2:
What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?

Answer:

Just as this consultation is underway the Government is seeking views relating to the National Model Design Code. In this proposed National Model Design Code, there is provision for local authorities to set 'policies for higher efficiency standards for their area or specific developments'. It is felt strongly that the planning authority should raise the bar in terms energy efficiency for all new builds and should make energy efficiency a key consideration of approval of the renovation and refurbishment of extant property (residential and industrial/commercial). Moreover, low energy networks may be encouraged by codes. In this case distributed heat networks and micro-grid power generation with energy storage facilities should also be promoted.

Consultation Question A3:
How should these actions be delivered and measured?

Answer:

The contribution of a development toward reducing carbon emissions should be measured more closely by consumption based emissions, by accessing output-area energy consumption data that is now available from energy distribution companies in greater fidelity and higher frequency than was available previously.

Consultation Question B1:
If we are to successfully tackle flood risk and promote sustainable water management, would the measures set out above go far enough?
Please explain your answer

Answer:

The measures to tackle flood risk and sustainable water management described on Page 15 do 'go far enough' in terms of new developments and where there has been no flooding. Where properties have been flooded and the flood risk is likely to remain high, it is essential that the Local Plan incorporates policy that seeks incorporation of property level flood resilience measures during repair. This aligns with Government's offer of further support for flood resilience measures announced on 1 February 2021.

If we are to successfully enhance our natural capital through place shaping and nature based solutions, would the measures set out above go far enough?
Please explain your answer

Answer:

Enhancing Green/Blue Infrastructure (GBI) and Biodiversity appears comprehensive and is a bold step. It is such a shame that there was no opportunity to review the emerging Green/Blue Infrastructure Strategy at the same time as the Local Plan Review.

Consultation Question B3:
If we are to successfully plan for a net zero carbon future through sustainable design and construction, would the measures set out above go far enough?
Please explain your answer

Answer:

The measures outlined under Policy Theme 3 tie-in with our comments in response to question at A2. The measures do go far enough but it would help to understand more about how the planning authority would assess either the viability or non-viability of development (Policy Theme 3 Box, bullet four). Moreover, how would this work in terms of an individual property, such as a self-build?

Consultation Question B4:
Is the move to a position where all new development is rated as zero carbon achievable from the date the Local Plan is adopted (i.e. from 2023)? How might this be achievable and if not, why not?
Please explain your answer

Answer:

Yes, the move to a position where all new development is rated as zero carbon from the date the Local Plan is adopted is achievable. Early notification of more stringent building codes, would help achieve that target.

Consultation Question B5:
Would a move to support the delivery of zero carbon new development materially affect scheme viability?
Please explain your answer

Answer:

A move to zero carbon might materially affect a development - house builders might have to incorporate new materials and technology and new building techniques. And consequently, in the early days there may some skill shortages in some areas of construction. The planning authority should take the opportunity to encourage local colleges of further education to incorporate those skills in trade courses. Ultimately, the viability of a development would not be undermined - the reduced through life day-to-day costs are likely to offset any slight increase in new build property prices during the early years of the Local Plan period.

Consultation Question B6:
In terms of performance standards for new buildings, what method(s) should the Council aim to implement?
For example, should we rely on current Building Regulations, or the Government's proposed 'New Homes Standards' (or any successor scheme, such as that promoted through the Planning White Paper) to achieve an uplift in the performance of new buildings?

Answer:

The Council should not rely on current housing regulations. The proposed National Model Design Code (see A2) provides local authorities opportunity to vary building standards. The Future ~~New~~ Homes Standards is a positive move forward but it does not go far enough. Under the Future Homes Standard energy consumption would be reduced by 20% or 31% under the proposed scheme. Wiltshire should aim for a **minimum** 50% reduction in energy consumption to ensure that all new homes are on track to be net zero carbon within the period of the Local Plan. Moreover, adoption of the Future Homes Standards is likely to remove the Planning Authority's ability to vary building standards to take account of local situation. And finally, adoption of the Future Homes Standard, which is very likely to be 2025, is too late. Wiltshire Council is implored to take the lead in driving higher building standards.

Consultation Question B7:
How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?
Please explain your answer

Answer:

Supporting the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions is likely to be much harder than new build development. Any benefits that accrue through either a retrofit programme or a modernisation programme are likely to undermined when the project does not take account of the whole building envelop. Moreover, not all retrofits and modernisation have to be submitted to the planning authority for approval. The intent of this suggestion is lauded but we cannot identify a planning oriented mechanism that would 'catch-all'. Rather working with local building suppliers and DiY stores and SME builders, to promote 'green' and 'low carbon' solutions might be easier way to drive change and adoption of low carbon options. Although the viability of a project to provide more space for a family might mean they have to opt for the low cost (purchase cost) regardless of the through life/operating costs. Moreover, as with any policy change, it is important to consider how the effective of a policy change can be measured.

Consultation Question B8:
If we are to make headway in terms of decarbonising energy production, consumption and emissions, would the measures outlined above go far enough? If not, what are we missing and how would additional measures be delivered?
Please explain your answer

Answer:

The measure outlined under Policy Theme 4 – Sustainable Energy Generation and Management, again, would go far enough with one exception. Where the policy theme focusses rightly on low energy heat technologies, such as air or ground source heat pumps, it needs to be coupled with making buildings more energy efficient, including increasing airtightness.

Consultation Question B9:
Should the Council set out policies that favour particular technologies, or should it encourage all technologies to provide green energy in Wiltshire?
Please explain your answer

Answer:

All technologies that provide green energy in Wiltshire should be encouraged. Where some technologies could be deployed in such a way as to improve the resilience of a development and /or neighbour they should be promoted first, such as a micro-grid based generation and storage facility.

Consultation Question B10:
Should the Local Plan set targets for the production and use of renewable energy? If so, what might they be and how would they be measured?
Please explain your answer

Answer:

No, rather than set targets for the production and use of renewable energy, the Local Plan should set targets for reductions in energy consumption. Again, the energy consumption of a development built against more stringent building standards can be assessed based on consumption. It is acknowledged that an occupant's behaviour can have significant effect on energy consumption, nevertheless the building envelop sets a baseline figure.

Consultation Question B11:
What steps should be taken to retrofit existing buildings with ultra-low or zero carbon forms of energy production? In particular, how could such technology be incorporated into buildings within sensitive locations such as Conservation Areas and/or Listed Buildings?
Please explain your answer

Answer:

As well as supporting the retrofit in existing buildings with ultra-low or zero carbon forms of energy production, communities should be given support to promote and develop local solutions. The establishment of a local micro-grid based energy generation and storage system, outside of/away from a conservation area and/or listed building might be a better option. It would also provide greater neighbourhood resilience.

Consultation Question B12:
If we are to tackle issues associated with air quality would the measures set out above go far enough and be effective in improving air quality in Wiltshire? If not, what measures are we missing and how should they be framed in land-use planning policy?
Please explain your answer

Answer:

The measures under Policy Theme 5 - Sustainable Transport and Air Quality would be effective in improving air quality in Wiltshire. Self-sustainment within Wiltshire settlements is crucial and a key enabling technology is digital connectivity. Neighbourhoods and developments should have minimum standards for digital connectivity and where that is not in place during the planning of a development, a developer should include delivery of digital connectivity as part of the plan.

What practical policy steps should the Local Plan take to significantly increase modal shift to public and active transport, and speed up the transition to greener fuelled vehicles?
Please explain your answer

Answer:

Again, the proposed National Model Design Code (link with A2 and B6) provides local authorities opportunity to vary building standards. The Future Homes Standard focusses on making changes to Part L (Conservation of Fuel and Power) and Part F (Ventilation) of the Building Regulations for new dwellings. Wiltshire Council should specify the incorporation of charging facilities in new homes providing opportunity for the latest generation of solar panels called for under the Future Homes Standard to recharge electric vehicles (EV). EV recharging points should also allow 'reverse flow', to provide a vehicle to grid (V2G) capability which would allow homeowners to use their EV as a mobile battery storage device to power their home and put energy back into the grid if the EV is parked at the time of at peak demand hence earning the vehicle owner money. For those developments where properties would not have either garaging or designated parking, developers should be required to put in place electricity charging points in lamp stanchions. Ideally, where developers install distributed heating systems solar PV cells should be installed on/alongside the centralised heating facility. At our response to question A1, we asserted our belief that reversal of the trend in carbon emissions can be achieved in an integrated way. Modal shift to public transport and active transport can be achieved by closer links between transport and planning policy. Where opportunity exists in a development segregated cycle lanes should be installed, as well as space for pedestrians. The National Model Design Code promotes the concept of low traffic neighbourhoods (LTN)) but only where supported by the local community. For a new development, there is unlikely to be a local community to seek advice from and in the case of a development in an existing neighbourhood, it is unlikely that all of the local community would have an informed opinion. The benefits of LTN's have become very clear during the current crisis. It is suggested that a requirement for low traffic neighbourhoods is set as the default. Moreover, junctions should be designed to give priority to active transport and non-vehicular users.

Consultation Question B14:
The electricity grid system may not be able to cope with a rapid take-up of electric vehicles and the charging infrastructure needed to power them? What measures should the Council explore with Distribution Network Operators/Distribution Service Operators to resolve this?
Please explain your answer

Answer:

It is acknowledged that parts of the electricity grid might not cope with a surge in demand for electric vehicles but it is interesting to note that the National Grid Future Energy Scenario (FES 2020) report does not foresee any major issues under any of the scenarios modelled. Rather, the National Grid's view is that 'most EV owners plug in their vehicles only when they need to charge, regardless of the time of day. In future, EV owners will be encouraged to keep their vehicles plugged in. A smart charging system will decide when is the best time to charge based on time of use tariffs designed to encourage charging when there is excess renewable energy and to avoid charging at times of peak demand.' This ties in with the V2G concept espoused at B13. By all means, Wiltshire Council should work with Distribution Network Operators/Distribution Service Operators to identify likely 'hotspots' - areas where electricity demand might be higher than usual due to early take-up of EVs. This might be relatively affluent neighbourhoods, bearing in mind the current relatively high purchase price for EVs, but it would not be considered an enduring issue, as people 'learn to live' with the new technology.

Consultation Question B15:
If all new development is to be future proof promote zero carbon living in energy production and consumption terms, what impact would this have on the design and viability of schemes?
Please explain your answer

Answer:

The prices of renewable energy technologies and energy efficiency technologies have reduced dramatically in recent years. The purchase prices of some low-carbon equipment is likely to continue to fall below the price of fossil fuel based heating systems in the next 2 to 3 years. Some of those technologies that are considered new and emerging in the UK, are in fact mainstream in some European countries already. For example, ground source heat pumps and air source heat pumps are the first choice for heating detached homes in Norway. Moreover, increased efficiency in energy use is likely to lead to lower through life/operating costs of properties. Ultimately, the economic viability of schemes will not be determined by the cost of renewable energy technologies and energy efficiencies. In terms of design, greater energy efficiency in homes, modal shift away from ownership of personal mobility vehicle to active transport and developments that are designed on a human scale will lead to better design and better community centric living environments.

If you have any further comments you wish to make, please detail them below.